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Last name: Pol

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Suburb:

City: Taupo

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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: 10.3

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

amend the wording so ONE Hectare blocks are allowed as of right on Centennial Drive.

Include reason(s) for your submission point

Centennial Drive is a perfect location for the New Rural Lifestyle Environment. The area has largely been subdivided already to One Hectare blocks.

These are ample for lifestyle living, and will allow enough space for privacy planting on the boundaries. Any larger will just create a liability.

The area is very close to town, and it already has a town water supply at the gates, so no further infrastructure is required.

We there fore seek to go to One Hectare blocks in this area as of right , rather than having to go to a notified consent.

This would also be in line with central government in a push to make more land available with a higher density.

Attached Documents

File
No records to display.



Submission Table

- We recommend using this submission table to state your submission points. This will assist Council to accurately record your submission points and ensure your submission is valid.
- Each individual submission point should be on a different row. Use as many rows as you require.
- You can attach additional commentary and documents should you need to.
- The examples in italics below are for guidance only to show how submission points could be set out and do not represent a position of Council.
- This form is for use for the following Plan Changes:
 - Plan Change 38 – Strategic Directions
 - Plan Change 39 – Residential Building Coverage
 - Plan Change 40 – Taupō Town Centre Environment
 - Plan Change 41- Removal of Fault lines
 - Plan Change 42 – General Rural and Rural Lifestyle Environments
 - Plan Change 43 – Taupō Industrial Environment Rezoning

Plan Change State which Plan Change that your submission relates (see above)	Specific part/provision State the specific part or provision of proposed Plan Change your submission relates to. If you cannot give a specific number Council Planners will add this for you.	Support? Oppose? Amend? choose one of the above	Relief sought What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?	Reasons Include reason(s) for your submission point
<i>Example 1</i> PC 38 – Strategic Directions	<i>Example 1</i> Climate Change, 2.4.2 Objective 2 Please delete when you prepare your submission	Support	Retain.	Support residential subdivision and development
<i>Example 2</i> PC 39	<i>Example 2</i> 2.5.2 Objective 4 Significant and Local Infrastructure Please delete when you prepare your submission	Oppose	Amend. Amend as follows (in large underlined): Local and national transport infrastructure located in the Taupō District operates in a safe, efficient and effective manner.	Our plans indicate the needs to be efficient, especially as the town gets bigger.
P.C. 42	Rural Lifestyle Sub division	amend	allow smaller subdivision of land in line with surrounding neighbours	To make better use of the land so close to town.
PC 43	Industrial Rezoning.	oppose	the area indicated on the map North and adjacent to Titan Way	Because of the elevation and close proximity to the rural lifestyle env, we will be adversely affected

anna pol
334 centennial Drive
Taupo 027-334 1232



GREAT LAKE TAUPŌ
Taupō District Council

Submission Form

The following submission is lodged in reference to a publicly notified Plan Change to the Taupō District Plan in accordance with Clause 6 of the First Schedule to the Resource Management Act 1991.

Name: **(please state full name)**

I wish to be heard in support of my submission.

~~I could gain an advantage in trade competition through this submission.~~

~~*I am directly affected by an effect of the subject matter of the submission that -~~

~~a. adversely affects the environment and~~

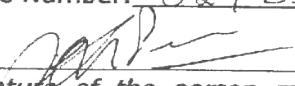
~~b. does not relate to trade competition or the effects of trade competition.~~

~~* Delete entire paragraph if you could not gain an advantage in trade competition through this submission.~~

Address for Service:

ANNA POL
334 Centennial Drive
Taupō RD2

Phone Number: 027 334 1232


Signature of the person making this submission or the person authorised to make this submission on their behalf

Date: 24-11-'22

Email: anna.mpol334

@gmail.com

**CLOSING DATE FOR
SUBMISSIONS:
4.30pm, Friday 9
December 2022**

Forms should be returned to any Taupō District Council office or mailed/emailed to:

Taupō District Council
Private Bag 2005
Taupō Mail Centre
Taupō 3352

Email: districtplan@taupo.govt.nz

TDC would be grateful if you can also email an electronic version of your submission

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- and/or it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy note: When a person or group makes a submission or further submission on Taupō District Plan Change 38-43 this is public information. Please note that by making a submission your personal details, including your name and addresses will be made publicly available under the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to TDC. There are limited circumstances when your submission or your contact details can be kept confidential. If you consider you have reasons why your submission or your contact details should be kept confidential please contact us at districtplan@taupo.govt.nz. Please visit our [Privacy Policy](#) page for further information.



First name: Jennifer

Last name: Molloy-Hargreaves

On behalf of:
Select an option...

Postal address:

Suburb:

City:

Country: New Zealand

Email: jmthth@gmail.com

Daytime Phone: 021588587

- I could
- I could not

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Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
Submission for TDC

1st Submission on Plan Change 42

We own 1667 Poihipi Road and would like this to be included in the Rural Lifestyle category as it has 4 ha properties' on three boundaries.

Just up the road there are numerous 4 ha properties and also a 1 ha property within 500 metres of our gate.

If we could put a second dwelling on this 4ha property for staff we would be able to keep 1663 Poihipi Road as food producing productive land going forward.

2nd Submission on Plan Change 42

We own 658 Tukairangi Road and we would like this to be included in the rural lifestyle category as there are several 4 ha blocks on the boundary and we would like to have our family on their own land near us and it would be much better if this was a permissible activity rather than having to apply for a resource consent. And this fits in with the current land use surrounding our property.

This will also allow for succession planning for our 4 children, 14 grandchildren and 12 Great grandchildren

Other plan changes – We are fully supportive of proposed Plan change 38, 39, 40, 41 and 43

Yours sincerely

Jennifer Molloy-Hargreaves



First name: Gareth

Last name: Moran

On behalf of:
Taupo Industrial Estate Limited

Postal address: 47 Alpha Street

Suburb:

City: Cambridge

Country: New Zealand

Postcode: 3434

Email: Garethm@barker.co.nz

Daytime Phone: 021745979

- I could
- I could not

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Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Plan Change 43 - Taupō Industrial Zone

Points: 19.2

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

refer to attachment

Include reason(s) for your submission point

refer to attachment

Attached Documents

File
PC 43 submission in support

Taupo Industrial Estate Limited

Submission on Plan Change 43 – Taupo Industrial Environments

To: Taupo District Council,
Private Bag 2005
Taupo 3352

Submitter details

Full name: Taupo Industrial Estate Limited
Postal Address: Suite 5, 47 Alpha Street, Cambridge 3434
Phone: 021 745979
Email: C/o Garethm@Barker.co.nz

Submission Details

1. Taupo Industrial Estate Limited (“TIEL”) are in **full support** of Plan Change 43 (“PC”) in its entirety, specifically the rezoning of the 4.5ha of land located at 189 Napier Road and identified in Council’s Section 32 analysis as ‘Site 7’ from Rural Environment to Taupo Industrial. Site 7 is identified in Figure 1 below.
2. TIEL supports PC 43 in its entirety; based on the reasons outlined in this document.
3. TIEL does not consider it can gain an advantage in trade competition through this submission.
4. TIEL wishes to be heard in support of its submission.
5. If others make a similar submission, TIEL will consider presenting a joint case with them at a Hearing.



Figure 1: Identification of the two sites that are proposed to be rezoned as part of PC43.

Overview of Site 7

6. Site 7 is zoned Rural Environment under the Taupo District Plan and has frontage to State Highway 1 to the east and Napier Taupo Road to the north. The area to the north on the opposite side of the road is zoned Taupo Industrial, the land to the south west is zoned Residential Environment. The remaining land to the west, south west and north west is zoned Rural Environment.
7. Site 7 contains the existing Westervelt building which is used for commercial offices. The remainder of the site is vacant of any buildings and structures and is currently grassed and unused.
8. A paper road that traversed the southern boundary of Site 7 and the adjoining property to the west was stopped by Council in 2013.
9. The site has one existing vehicle crossing connecting with Napier Taupo Road.



Figure 1: Site and surrounding area

Consented Environment

10. Site 7 is subject to a subdivision and landuse consent approved in 2008, to develop the subject site and surrounding land to the south and south west for a mixture of residential, educational and commercial activities.
11. As part of the consenting process, Council adopted a Master Plan which signified the type of development anticipated for the site and surrounding area.
12. Despite the consented development identified in the Master Plan, the zoning of the site remained 'Rural Environment'.
13. The development outcomes identified in the Master Plan required implementation via consent notices registered on all underlying titles as part of a later subdivision of the site. The following consent notice applies to the Site:

Development including further subdivision, building and any change of use is required to demonstrate compliance with the approved East Urban Lands landuse consent Masterplan reference 080142 granted on 9 June 2009 for the area described as "The Campus".

14. The Master Plan identifies the Site 7 as suitable for 'employment/education' (Campus Commercial Area) which could include the following types of activities; offices, education facilities, recreation, Industrial, Research and Visitor Accommodation.
15. Based on correspondence from TDC, TIEL understands the Masterplan was developed for TDC land with the intention that TDC would also be the land developer. Overtime, TDC has stepped away from the development of the Master Plan and is now providing development blocks to the market to be developed in accordance with the Masterplan OR in agreement with the consent holder to undertake changes (via section 127 or 221(3) depending on timing of the super lot staged subdivision).

16. Accordingly, the development for the Site, intended by the Masterplan of 2008 (14+ years ago), is no longer being progressed. Indeed, while the residential development anticipated by the Masterplan has progressed following the “master plan” land use consent being granted, the Site has remained undeveloped (except for the existing Westervelt commercial building). It is TIEL understanding that there are no plans by TDC to develop the Site for “campus” use. The feasibility of a tertiary institute/University or similar, for the Site marginal at best. Relevantly, TDC has no plans to facilitate a similar development. The consent notices are essentially redundant. TIEL intends to apply for the removal of these consent notices in due course.

The Submission is:

17. TIEL are in **full support** of PC 43 in its entirety, specifically the rezoning of the 4.5ha of land located at 189 Napier Road and identified in Council’s Section 32 analysis as ‘Site 7’ from Rural Environment to Taupo Industrial.

Reasons for Submission:

18. Given the development expectations for the site are driven by the Master Plan which identifies the site for commercial/educational activities, the current zoning of Site 7 (Rural Environment) does not reflect the intended use of the site.
19. The proposed re-zoning, aligns the zoning of site with the anticipated development and environmental outcomes for site and wider area. This represents an appropriate use of the site, given that both rural and “campus” activities will not be realised.
20. While Site 7 is currently zoned Rural Environment, it is unlikely that the site will be used for productive rural related purposes.
21. The Plan Change from Rural Environment to Taupo Industrial aligns with Taupo District Council’s strategic direction to create additional Industrial Zoned land.
22. From a transportation perspective, the proposed rezoning of Site 7 provides opportunities to maximise the investment value in the existing and planned transport networks. It allows for the relocation of industrial and ‘big box’ car-based retail outlets to locate adjacent to the arterial road network, potentially removing these activities and their associated high car use and commercial vehicle needs from the town centre.
23. Site 7 has potential to connect to the existing walking and cycling network along the Eastern Taupo Arterial and is well located in relation to other similar activities, existing and planned residential areas to provide employment opportunities as well as some everyday supporting services which reduces people’s overall need to travel.

24. Site 7 is owned by one individual landowner which will create efficiencies during the construction and development phase, should the plan change be approved as notified.
25. Re-zoning of Site 7 will enable the area to be developed in a planned and integrated manner, which would not be possible if 'ad-hoc' land use resource consents are approved by Council in the immediate vicinity
26. The re-zoning of Site 7 will support the consolidation of industrial activities and proposed growth of industrial activities in Taupo and will subsequently reduce the risk of inappropriate industrial sprawl throughout the rural area. Controlled industrial growth will ensure the vibrancy of the Taupo town centre is maintained and enhanced.
27. TIEL considers that the zoning, objectives, policies and rules of PC43 are appropriate to optimise the development opportunities, vision and outcomes for the locality.
28. Site 7 has good accessibility and connectivity to the surrounding arterial road network, including State Highway 1 and Napier Road.
29. Site 7 does not contain any natural features of significance; thus, the proposed rezoning will not contribute to any loss in ecological values.
30. There is an identified shortfall of industrial land within the Taupo which is restricting economic growth and wellbeing of the district's economy. The re-zoning of Site 7 will alleviate some of this pressure.
31. TIEL considers that the inclusion of Site 7 as industrial zoning will enhance the local economy and accelerate growth through the creation of additional employment opportunities which will supplement residential growth currently occurring within the wider Taupo area.
32. The rezoning of Site 7 will relieve price pressure and provide more affordable development opportunities through the releasing of additional industrial land for development that can accommodate increasing business and industrial demand.
33. Well-functioning urban environments as required by Policy 1 of the National Policy Statement for Urban Development (NPS-UD), are environments that, as a minimum have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport. The rezoning of Site 7 aligns with this key directive identified in the NPS-UD.

Decision Sought

34. TIEL seek that that Plan Change 43 (PC43) as notified is approved by Taupo District Council. In particular, TIEL seeks that the land identified in Council's 32 analysis as 'Napier Road' be rezoned from Rual Environment to Taupo Industrial.

Dated this 30 day of November 2022



First name: Helen

Last name: Brosnan

On behalf of:
Mega Food Services Limited

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Suburb:

City: Taupo

Country: New Zealand

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Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
17685 Information about Mega Food Services Limited
17685 Preliminary Geotechnical Assessment Report 2018 (1)
17685 Submission Plan Change 43



Proposal for Future Logistics Center at 63 Broadlands Road, Taupo

I. The Site

63 Broadlands Road, Taupo (the Site) is an irregular parcel of land approximately 20ha in size. It is a rural allotment, comprising of a single lot being Sec 14 SO 438782 (see Figure 1).

The site is located to the north-east of the Taupo town center and adjoins Broadlands Road to the south and the Taupo bypass to the west.

On the opposite side of the Taupo bypass, to the west, is the Taupo industrial zone.



Figure 1: The subject site relative to the surrounding environment

II. The Proposal

The proposal is to rezone the subject site to allow for industrial uses (logistics center).

The Logistics Center

One part of the site will be used as a logistics center for Mega Food Services.

It is proposed that 5x 10m high warehouses be built towards the eastern boundary. These buildings will be used as a cold store, courier services, dry goods store, and redistribution center.

A new vehicle crossover is proposed on the south-eastern corner of the site to allow access onto Broadlands Road. Truck parking will be located at the frontage of the warehouses.

To mitigate potential visual and amenity impacts, 15m and 25m setbacks are proposed on the eastern and southern boundaries respectively.

The logistics center is predicted to employ 10-20 workers, and, given the type of operation proposed, these workers are likely to be from Taupo and surrounds.

Subdivision of the site

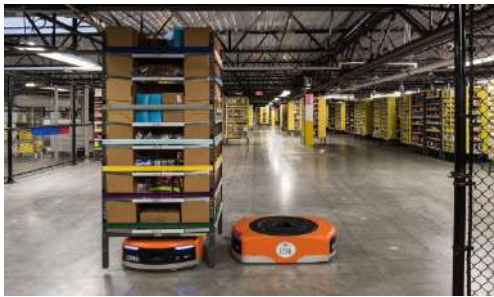
The site will be further subdivided to allow for other similar uses by other businesses.

At this stage a specific subdivision plan has not been prepared however the subdivision is likely to comprise of large allotments to accommodate for warehousing for other businesses.



Industry 4.0 and Robots in Warehouses

The latest amazing technology will be used in our Logistics Center in the near future, which will attract the other businesses or investors.



(The images shown here are from Google and indicative only.)

III. Why Taupo?

In the right middle of the North Island

Ideal for medium to large Freight companies and Distributors to have storage and a transferring stop here



Auckland to Wellington: 643km / 8 hours (car driving)
Truck average speed is only 70-80km/h. No truck driver can return within 1 day.

If the travel can be split into two parts as follows:
Auckland to Taupo: 275km / 3.5 hours
Taupo to Wellington: 372km / 4.5 hours
Both of the drivers can return to home the same day. One of them would be hired locally in Taupo. Also, they can exchange goods.

IV. Positives for Taupo

- The proposal is a logical expansion of the industrial area given that it adjoins the bypass and is located an appropriate distance from the Taupo town center;
- There are no impacts to residential properties, as the site is located away from residential uses;
- The site is ideally located for a logistics center as it has easy access to Broadlands Road and the Taupo bypass;
- The logistics center will attract investment into the region, providing greater job opportunities for the local community;
- The proposal will increase the Taupo GDP, making it even more attractive for future investment; and
- The proposal will redirect large truck movements away from the Town Center providing a better pedestrian environment and improving air quality.



V. Mega Food Services



Market leading supplier of chilled and frozen foods throughout the North Island

3 Plants

20 Years' Experience

20 Trucks

20% Market Share

80 Employees

80 Containers imported per year

20+ tons of meat processed per day

30+ tons of products delivered per day

500+ Categories of products

600+ Deliveries per day

1,500+ customers

60M Turn Over

Mega Food Services Ltd.

63 Broadlands Road, Taupo

Preliminary Geotechnical Assessment Report

*17685
22 March 2018*

Mega Food Services Ltd

63 Broadlands Road, Taupo

Preliminary Geotechnical Assessment Report

Prepared by:



Andres Martinez
Geotechnical Engineer
BSc (Civil), Dip.Env.Eng, MEngNZ

Reviewed by:



Thomas Brand
Engineering Manager
BSc(Civil), CPEng, CMEngNZ, IntPE (NZ)

Date: 22 March 2018
Reference: 17685
Status: FINAL
Revision: NA
Previous Revision Date: NA

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Appendices –

1. Sales & Purchase Plan 17685-101
2. Test Location Plan 17685-SK001
3. Ground Test Results

1. INTRODUCTION

Cheal Consultants (Cheal) has been engaged by Alan Lun on behalf of Mega Food Services Ltd (Client), to carry out a geotechnical assessment and provide a Preliminary Report for a proposed commercial development at 63 Broadlands Road, Taupo. The purpose of this report is to define geotechnical constraints which could influence future construction of the proposed development. Access to the site is gained from Broadlands Road to the south.

The proposed development encompasses the construction of five 10m high warehouses with an area of 960m² each and a driveway for trucks around them, on a triangular piece of land to the east of the site. The entire site is legally described as SO 438782. Location of both the site and tested area (red polygon) are shown in Figure 1 below. A copy of the proposed development is attached in Appendix 1.



Figure 1: Site Location (Mapi; TDC)

The report has been prepared in general accordance with the brief given to Cheal by the Client and is intended to be used as preliminary information for Subdivision Consent process.

2. SITE ASSESSMENT

2.1 Geomorphology - Geology

The main geomorphologic features shaping the site are shallow incised gullies running east to west. From Broadlands Road, the site drops gently from east to west. At the site, but out of the proposed area to be developed, indication of geothermal features (i.e. deceased vegetation, sulphur patches on surface, steam) were noticed.

No evidence of erosion is present on the gully sides.

From the Institute of Geological & Nuclear Sciences (GNS) 1:250K Geological Web Map, the site is underlain by non-welded ignimbrite and phreatomagmatic fall deposits and reworked ignimbrite, pumice of the Oruanui Formation. From the same map the inferred alignments of the Rotokawa fault is noticed 400m to the northwest of the site. This is a normal and active fault, however is not considered to have the potential to affect the site.

Taupo District Hazards Plan shows the western side of the site inside the Tauhara geothermal zone, but outside of the proposed area to be developed, as shown in Figure 1 above.

Liquefaction and its consequences on the surface are not considered to have the potential to affect the site.

2.2 Specific Site Assessment

On 28 February 2018, Kurt Larsen (Engineering Technical Assistant) and Andres Martinez (Geotechnical Engineer) from Cheal attended the site to carry out a walkover and isolated near to surface ground testing to define major soils constraints affecting the proposed development.

2.2.1 Site Walkover

The site was covered by grass. Small mounds were present all around the site. Isolated and small sinkholes were noted, one of those showed evidence of dumped materials (i.e. fence wires).



Photo 1: Shallow Gully and Mounds

No presence of water running through the gullies was noticed. Expressions of geothermal features on surface were not noticed.

2.2.2 Specific Testing

Eight Scala Penetrometer Test (Scala's), one Hand Auger Test (HA) and eight temperature readings (TR) were undertaken on selected spots within the proposed building envelopes and nearby areas. Scala's were performed to a target depth between 1500 to 2000mm deep, to have an insight of the

strength of the soils which will support building foundations and traffic loads. The HA test was carried out on the Scala location which showed indication of soft soils. Location of tests and the results are attached in Appendix 2 and 3 respectively.

2.3 Soils Conditions

In general, the whole site is covered by 150 to 250mm of organic sand/topsoil. Minor fill material is expected to have been placed at some spots around the site. Dumped materials are also expected to be present in isolated spots.

Results from Scala were in general consistent between locations, showing from ground level and down to 200-300mm deep estimated allowable bearing capacity (ABC) values lower than 50kPa (1 to 2 blows per 100mm penetration), beyond this soils meet the definition of "Good Ground" as per NZS3604:2011, except for soils at Scala locations 1 and 5 which showed weak materials down to 500 - 700mm deep, respectively.

For roading purposes a conservative CBR value of 8% could be used for preliminary design. Cheal expects that after topsoil is removed and earthworks are completed, near to surface ground conditions (i.e. strength, packing) will improve.

HA1 carried out at Scala 8 location (Photo 2 below), exposed 200mm of topsoil, followed by brown silty sand down to 400mm deep, then pale brown pumiceous sandy gravel with minor cobbles down to 600mm deep and finally white dry and well packed pumiceous sands down to tests termination at 1200mm deep. Water level was not identified.



Photo 2: Recovered Soil HA1 Location

From temperature testing, carried out at 1000mm deep at each Scala location, no evidence of geothermal heated materials was noticed. Table 1 below shows temperature readings from the site.

Table 1: Temperature Readings

Test	Temperature Reading (° Celsius)
T1	21.7
T2	19.8
T3	20.5
T4	20.6
T5	20
T6	21.1
T7	20.8
T8	19.8

Temperature values are not expected to exceed the “Council Standard” of less than 10°C difference in temperature, if values are compared against the readings on a “control point” outside hot ground areas. At the site, there were no obvious signs of high energy geothermal features on the ground surface such as geysers, mud geysers and fumaroles.

3. RECOMMENDATIONS

3.1 Earthworks

Based on the geomorphological appraisal and soils testing, minor earthworks (cut/fill) are expected to create a flat / gently sloping land with suitable materials to support both foundations of the proposed structures and vehicle loads. 150 to 250mm of topsoil materials covering the site will need to be stripped off and stock piled before suitable materials sourced from the eastern side of the site are excavated and blended to be used to fill the gullies.

Following topsoil removal, there will be opportunity to define areas with dumped materials (if any) and carry out any required remediation (undercut disposed of and backfill with suitable materials).

A topographical survey and engineering modelling will confirm if a cut and fill balance exercise could be achieved. If fill materials need to be imported, those will need to be clean granular fill. Adequate techniques and equipment are required to compact fill materials.

Any structure (i.e. building platforms, roads) shaped by the placement of fill material thicker than 600mm will require specific engineering design (SED) of the fill.

Any exposed natural/earth worked slopes will need to be covered with adequate vegetation.

Proposed earthworks need to consider stormwater runoff.

3.2 Foundations

In general, after topsoil removal, excavations are expected to expose sandy gravels and sands varying in thicknesses and with suitable strength conditions to support loads, therefore a shallow foundation system (i.e. conventional NZS3604:2011) could be suitable for this site. This could be confirmed once the expected loads from both the structures and the piled goods/equipment are known.

Due to the expected size of concrete slabs and the inability of the top 300mm of pumiceous materials supporting them to bond together, some amount of compacted hard fill will be required under slabs to minimise the effect of granular materials rearrangement generated by equipment/vehicles traffic/piled goods on top (i.e. fork lifts, trucks). Foundations for roads will also require additional engineering input to account for the expected vehicle loads.

Upon completion of earthworks, additional geotechnical investigation will be required to both verify the findings from the preliminary investigation and to check suitability of fill materials, particularly on locations around the footprint of the proposed structures.

3.3 Rooding

As per section 3.2 above and based just on results from the Scala tests and assuming top soil is removed and replaced with suitable fill material, a CBR value of 8% is recommended for preliminary design of roads.

3.4 Stormwater

From the undertaken site investigation permeable materials on this site are considered suitable for disposal of stormwater via controlled soakage to ground.

Infiltration rates of the order of 1000 to 1500mm/hr could be assumed for the design of stormwater disposal systems on any lot (i.e. soak holes, soakage trenches or similar).

Soak hole number, detention capacity, outflow rate and depth of permeable concrete liners for the soak holes and/or sizes of soakage trenches should be considered during the design stage.

3.5 Slope Stability

New cuts and fill batters required to reshape the site for the placement of the proposed structures and roads will require 1H:4V and 3H:1V slope configurations, respectively. Any cut/slope batter to be covered with adequate vegetation immediately after completion.

3.6 Erosion

Erosion on this site could occur when high volumes of water with a high flow velocity remove particles from loosely packed materials with minimum vegetative coverage on sloping areas. Additional consideration is required during design to provide adequate measure to minimise the erosion issues on new cut slopes and slope batters.

4. CONCLUSIONS

From the analysis of the collected geotechnical information, the site is considered geotechnically suitable for the proposed extension, subject to the recommendations provided as part of this report.

The site is grass covered, sloping down gently from Broadlands Road to the east and with shallow gullies following the same direction.

In general, organic sands (topsoil) and silty sands down to 200-400mm deep cover the entire site and cannot be considered Good Ground as per NZS3604:2011. Below those materials, suitable pumiceous sandy gravels and sands, with estimated allowable bearing capacity of at least 100kPa are present.

No evidence of geothermal heated materials was noticed on this site.

Minor earthworks (cut/fill) are expected to create a flat / gently sloping land with suitable materials to support both the foundations of the proposed structures and vehicle loads.

Dumped materials requiring remediation/improvement (undercut disposed of and backfill with suitable materials) could be present.

Additional engineering inputs are required to define whether or not a cut and fill balance exercise could be achieved. Fill material deeper than 600mm will require specific engineering design (SED).

Upon completion of earthworks, additional geotechnical investigation will be required to both verify the findings from the preliminary investigation and to check suitability of fill materials, particularly on locations around the footprint of the proposed structures and where fill exceeds 600mm.

Proposed earthworks need to consider stormwater runoff.

In general, after topsoil is removed/replaced and final levels are achieved (fill/cut), materials with suitable strength conditions to support loads are expected to cover the entire site, therefore a shallow foundation system (i.e. conventional NZS3604:2011) could be used, provided expected internal/external loads from the proposed structures are considered. Hard fill underneath slabs will be required.

Vertical loads service settlements affecting dwellings are not anticipated, provided foundations are supported by at least 1000mm of suitable natural/fill materials.

For preliminary design of roads, a conservative CBR value of 8% could be used.

Disposal of stormwater via controlled soakage to ground is considered suitable, provided additional engineering inputs are taken into account during design stage.

1H:4V and 3H:1V slopes configurations for new cuts and fill batters, respectively, are recommended. Any exposed natural/earth worked slopes will need to be covered with adequate vegetation as soon as practicable.

5. DISCLAIMER

This Report has been prepared solely for the use of our client with respect to the particular brief given to Cheal Consultants.

No liability is accepted in respect of its use for any other purpose or by any other person or entity. All future owners of this property should seek professional geotechnical advice to satisfy themselves as to its ongoing suitability for their intended use.

The opinions, recommendations and comments given in this Report are the result from the application of accepted industry methods of site investigation. As factual evidence over much of the site has been obtained solely from isolated near to surface ground testing (which by their nature only provide information about that exact location), there may be special conditions pertaining to this site which have not been identified by the investigation and which have not been taken into account in the report. Any groundwater levels measured during the investigation may change over time.

If variations in the subsoils occur from those described or assumed to exist, then the matter should be referred back to Cheal Consultants immediately.

CHEAL CONSULTANTS LIMITED

Appendix 1

Sales & Purchase Plan
17685-101

DISCLAIMER

This sketch drawing shall be used for the purpose of discussion and shall not form any part of a tender or construction process. The information hereon shall not be passed on to any third party without the express written permission of Cheal Consultants Ltd. In the event of this information being passed on to a third party, even with written permission, or the information being used for any other purpose than discussion, Cheal Consultants Ltd take no responsibility for its correctness and subsequent use.

Aerial Imagery has been obtained from Taupo District Council web site and is provided under a Creative Commons Public License. It has been provided as a guide to where the boundaries or other features are positioned, or proposed on the ground, but may not be absolute.

Contour Interval = 1m



Rev	Date	Amendment	By	Chk	App
A	07/12/17	For Discussion	PH	CE	SP

Project Title
Mega Foods Limited
63 Broadlands Road
Taupo

Drawing Title
Sales & Purchase Plan

Surveyed			
Designed	C Eagles	07/12/17	CE
Drawn	P Harris	07/12/17	PH
Checked	S Prasad	07/12/17	SP
Approved	S Prasad	07/12/17	SP

Status **INFORMATION**

Scale	A1	1:1500	A1
	A3	1:3000	
Drawing Number	17685-101		Rev
			A

Appendix 2


Test Location Plan
17685-SK001



cheal			
Designed	Checked	Approved	Date
KL	AM	-	28.02.18

Notes
Mega Food Services Limited
63 Broadlands Road, Taupo
Geotechnical Investigation

Drawing Title	Test Locations Plan
Drawing Number	17685-SK001

Legend:
Scala only 
Scala + Hand Auger 

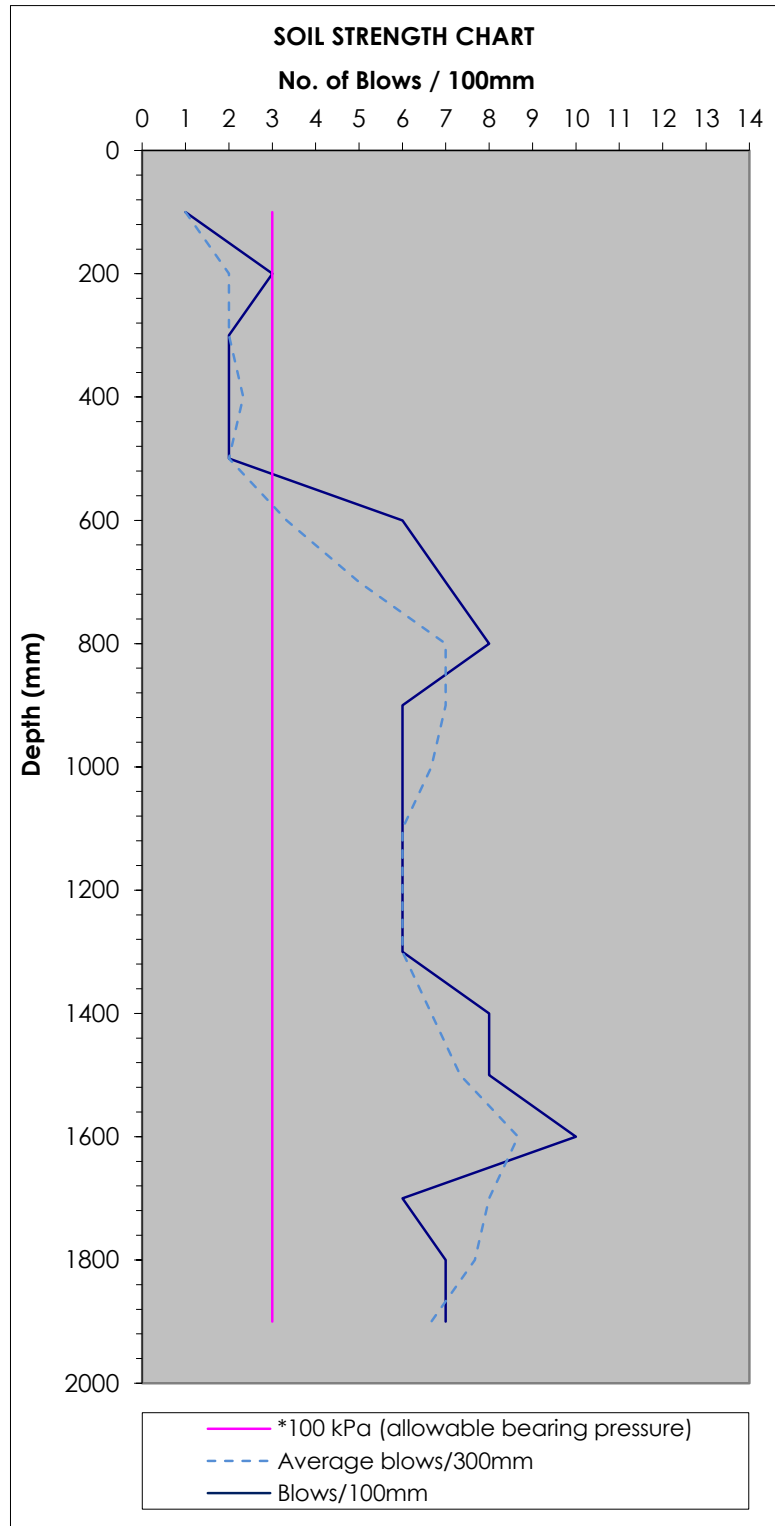
Appendix 3

Ground Test Results

Scala Penetrometer Test

Job No.	17685 Mega Food Services Limited		
Location:	63 Broadlands Road, Taupo		
Test No.:	S1	Starting Depth:	Existing Ground Level
Date:	28/02/2018	Test by:	AM, KL

Depth (mm)	Blows	Average Blows / 300mm
0 - 100	1	1.0
100 - 200	3	2.0
200 - 300	2	2.0
300 - 400	2	2.3
400 - 500	2	2.0
500 - 600	6	3.3
600 - 700	7	5.0
700 - 800	8	7.0
800 - 900	6	7.0
900 - 1000	6	6.7
1000 - 1100	6	6.0
1100 - 1200	6	6.0
1200 - 1300	6	6.0
1300 - 1400	8	6.7
1400 - 1500	8	7.3
1500 - 1600	10	8.7
1600 - 1700	6	8.0
1700 - 1800	7	7.7
1800 - 1900	7	6.7

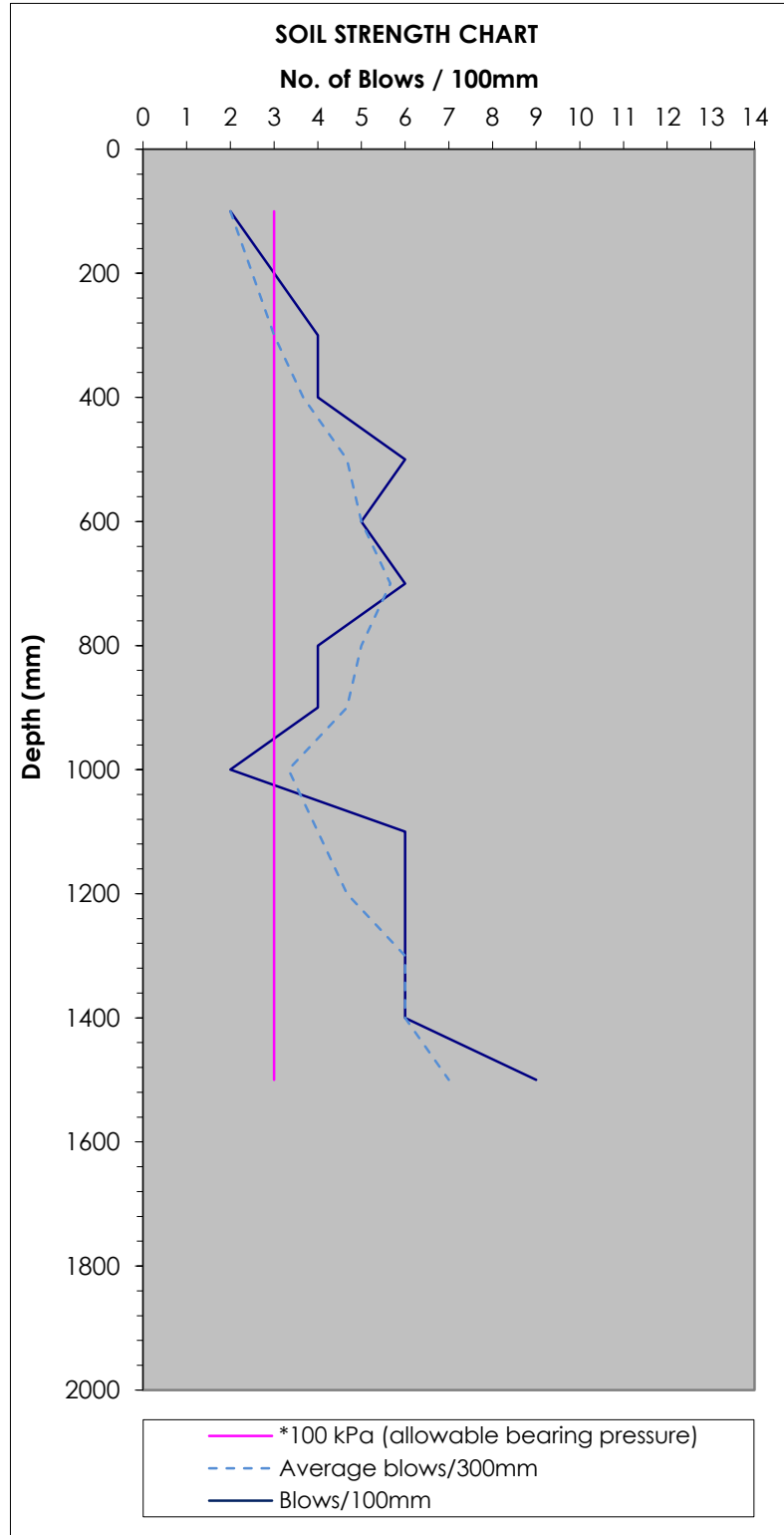


**Stockwell 1977 (3 blows/100mm)*

Scala Penetrometer Test

Job No.	17685 Mega Food Services Limited		
Location:	63 Broadlands Road, Taupo		
Test No.:	S2	Starting Depth:	Existing Ground Level
Date:	28/02/2018	Test by:	AM, KL

Depth (mm)	Blows	Average Blows / 300mm
0 - 100	2	2.0
100 - 200	3	2.5
200 - 300	4	3.0
300 - 400	4	3.7
400 - 500	6	4.7
500 - 600	5	5.0
600 - 700	6	5.7
700 - 800	4	5.0
800 - 900	4	4.7
900 - 1000	2	3.3
1000 - 1100	6	4.0
1100 - 1200	6	4.7
1200 - 1300	6	6.0
1300 - 1400	6	6.0
1400 - 1500	9	7.0

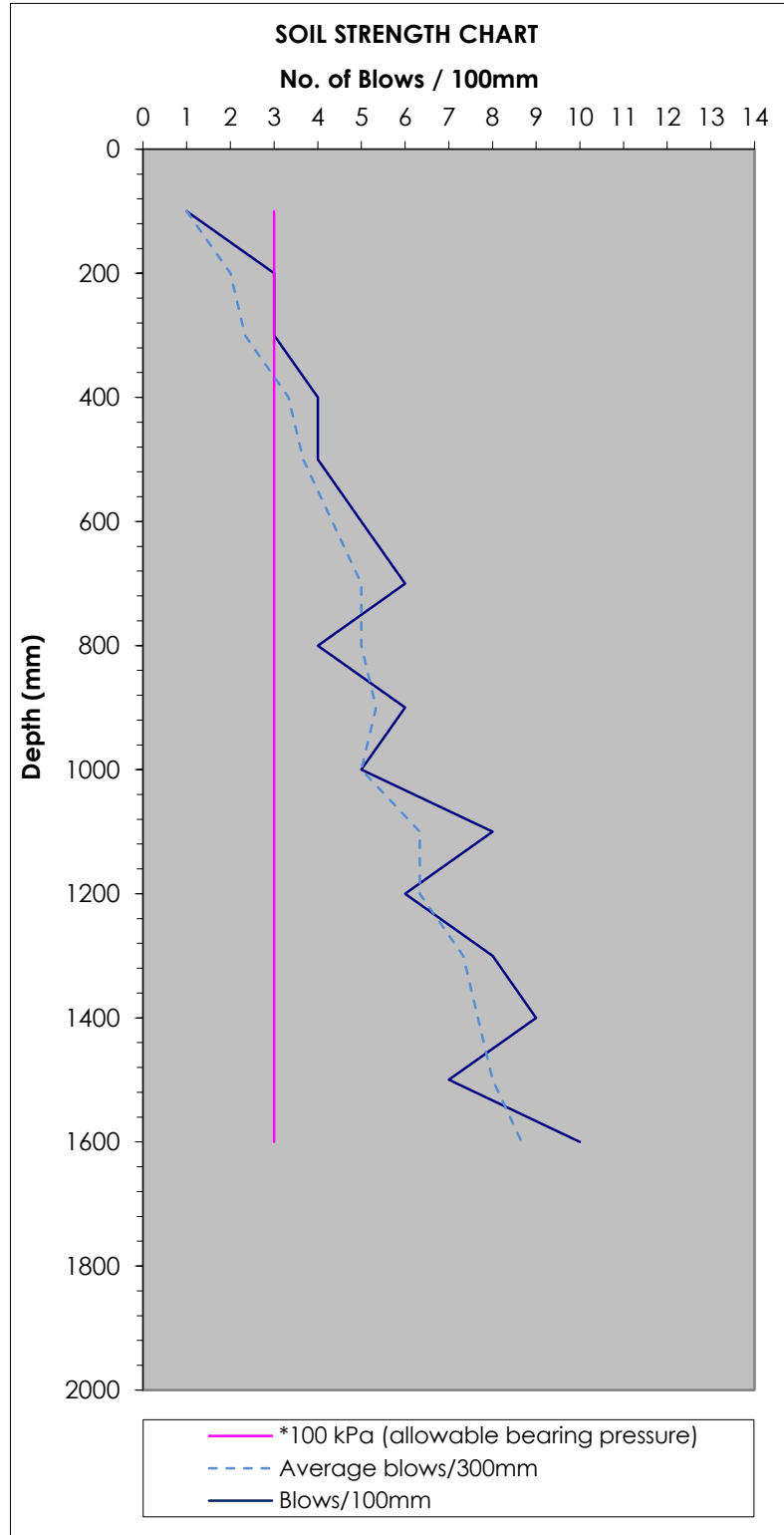


***Stockwell 1977 (3 blows/100mm)**

Scala Penetrometer Test

Job No.	17685 Mega Food Services Limited		
Location:	63 Broadlands Road, Taupo		
Test No.:	S3	Starting Depth:	Existing Ground Level
Date:	28/02/2018	Test by:	AM, KL

Depth (mm)	Blows	Average Blows / 300mm
0 - 100	1	1.0
100 - 200	3	2.0
200 - 300	3	2.3
300 - 400	4	3.3
400 - 500	4	3.7
500 - 600	5	4.3
600 - 700	6	5.0
700 - 800	4	5.0
800 - 900	6	5.3
900 - 1000	5	5.0
1000 - 1100	8	6.3
1100 - 1200	6	6.3
1200 - 1300	8	7.3
1300 - 1400	9	7.7
1400 - 1500	7	8.0
1500 - 1600	10	8.7

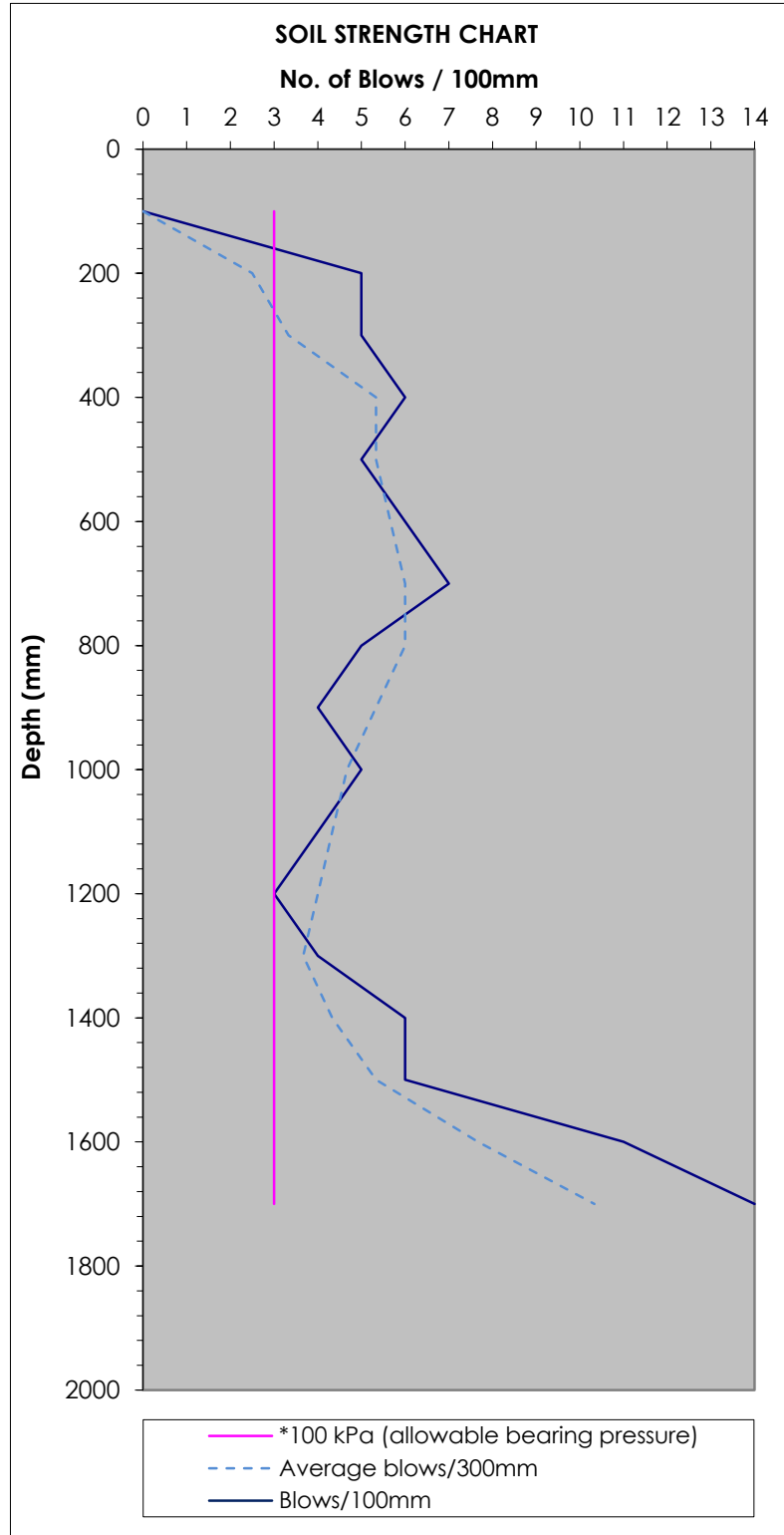


**Stockwell 1977 (3 blows/100mm)*

Scala Penetrometer Test

Job No.	17685 Mega Food Services Limited		
Location:	63 Broadlands Road, Taupo		
Test No.:	S4	Starting Depth:	Existing Ground Level
Date:	28/02/2018	Test by:	AM, KL

Depth (mm)	Blows	Average Blows / 300mm
0 - 100	0	0.0
100 - 200	5	2.5
200 - 300	5	3.3
300 - 400	6	5.3
400 - 500	5	5.3
500 - 600	6	5.7
600 - 700	7	6.0
700 - 800	5	6.0
800 - 900	4	5.3
900 - 1000	5	4.7
1000 - 1100	4	4.3
1100 - 1200	3	4.0
1200 - 1300	4	3.7
1300 - 1400	6	4.3
1400 - 1500	6	5.3
1500 - 1600	11	7.7
1600 - 1700	14	10.3

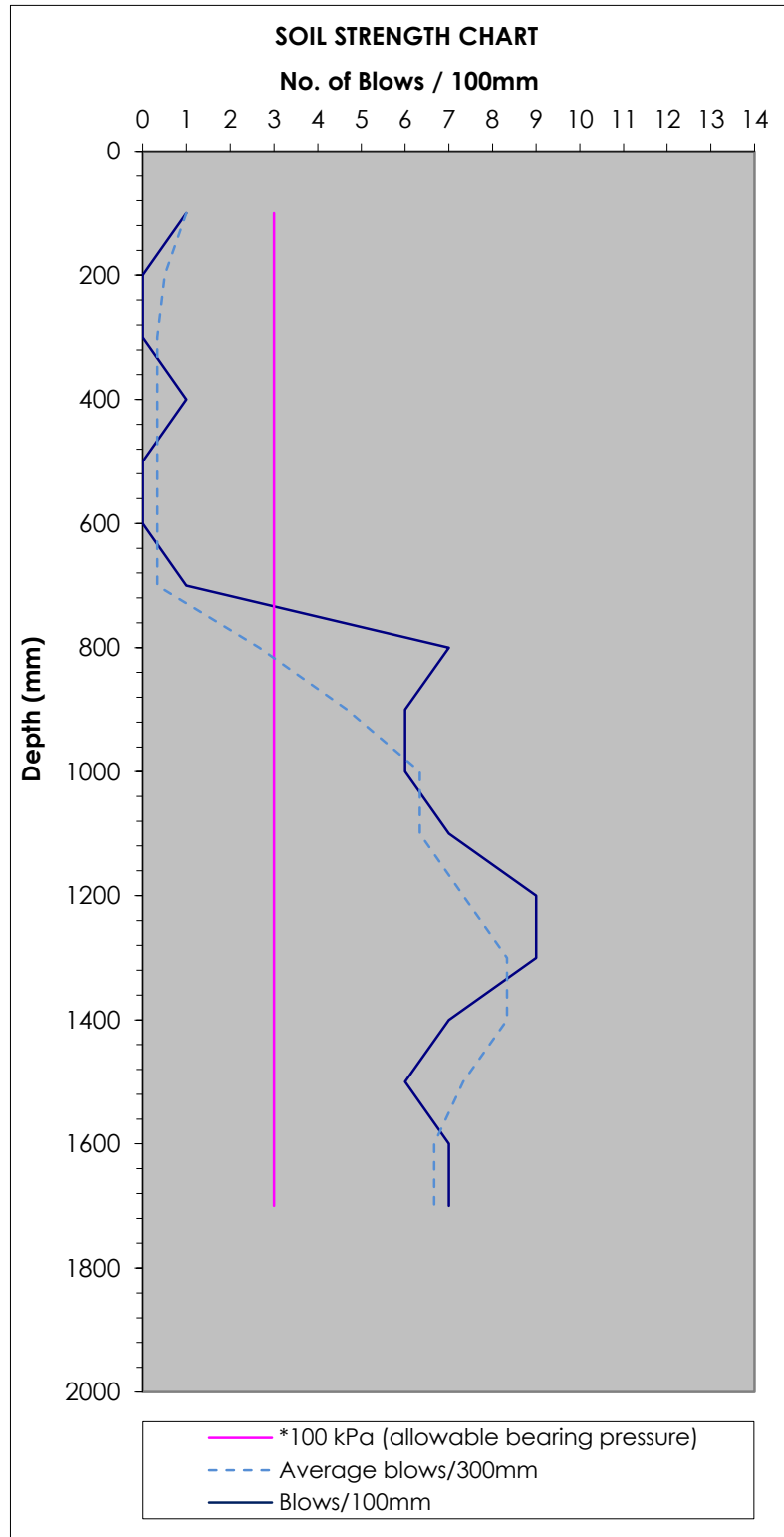


**Stockwell 1977 (3 blows/100mm)*

Scala Penetrometer Test

Job No.	17685 Mega Food Services Limited		
Location:	63 Broadlands Road, Taupo		
Test No.:	S5	Starting Depth:	Existing Ground Level
Date:	28/02/2018	Test by:	AM, KL

Depth (mm)	Blows	Average Blows / 300mm
0 - 100	1	1.0
100 - 200	0	0.5
200 - 300	0	0.3
300 - 400	1	0.3
400 - 500	0	0.3
500 - 600	0	0.3
600 - 700	1	0.3
700 - 800	7	2.7
800 - 900	6	4.7
900 - 1000	6	6.3
1000 - 1100	7	6.3
1100 - 1200	9	7.3
1200 - 1300	9	8.3
1300 - 1400	7	8.3
1400 - 1500	6	7.3
1500 - 1600	7	6.7
1600 - 1700	7	6.7

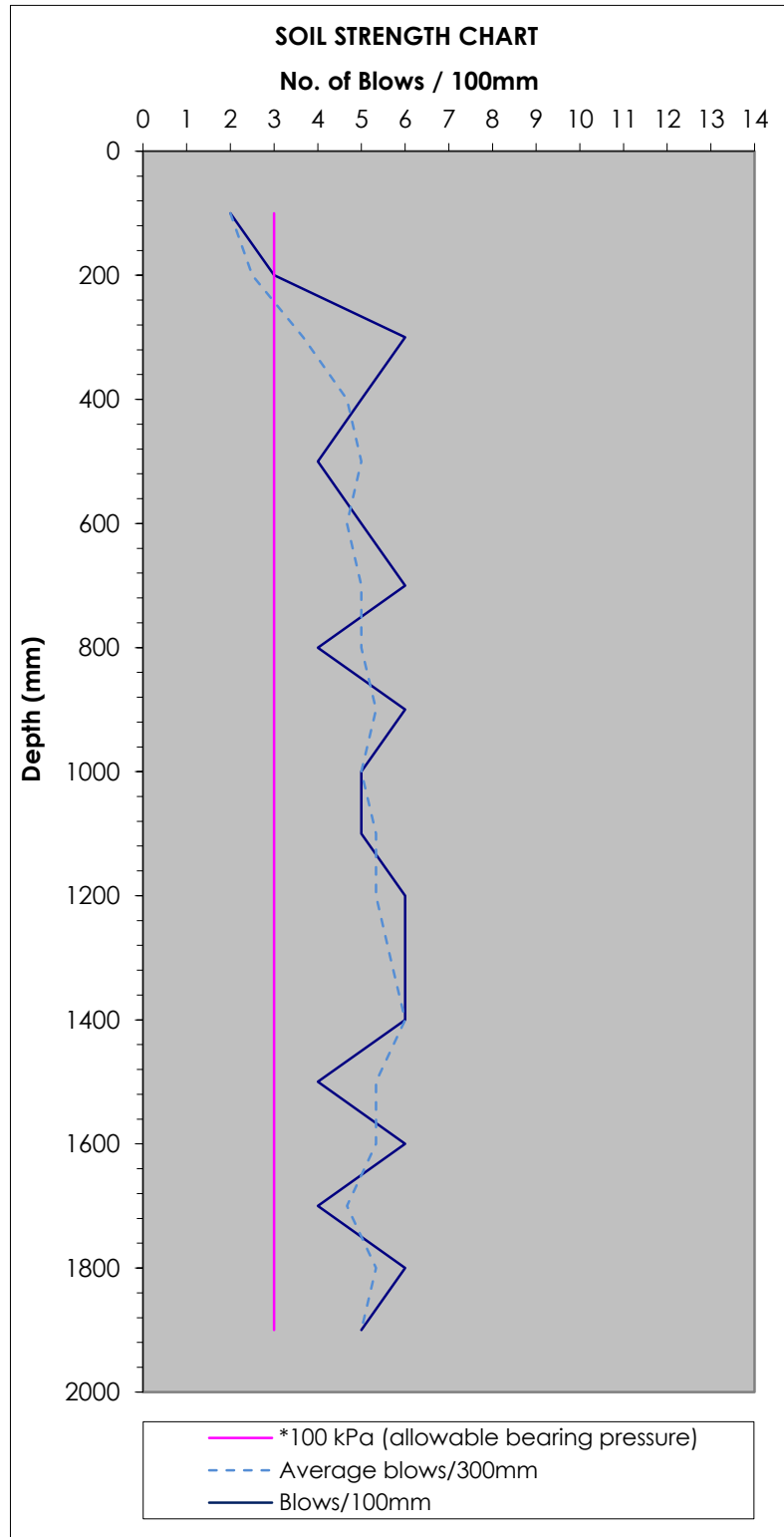


**Stockwell 1977 (3 blows/100mm)*

Scala Penetrometer Test

Job No.	17685 Mega Food Services Limited		
Location:	63 Broadlands Road, Taupo		
Test No.:	S6	Starting Depth:	Existing Ground Level
Date:	28/02/2018	Test by:	AM, KL

Depth (mm)	Blows	Average Blows / 300mm
0 - 100	2	2.0
100 - 200	3	2.5
200 - 300	6	3.7
300 - 400	5	4.7
400 - 500	4	5.0
500 - 600	5	4.7
600 - 700	6	5.0
700 - 800	4	5.0
800 - 900	6	5.3
900 - 1000	5	5.0
1000 - 1100	5	5.3
1100 - 1200	6	5.3
1200 - 1300	6	5.7
1300 - 1400	6	6.0
1400 - 1500	4	5.3
1500 - 1600	6	5.3
1600 - 1700	4	4.7
1700 - 1800	6	5.3
1800 - 1900	5	5.0

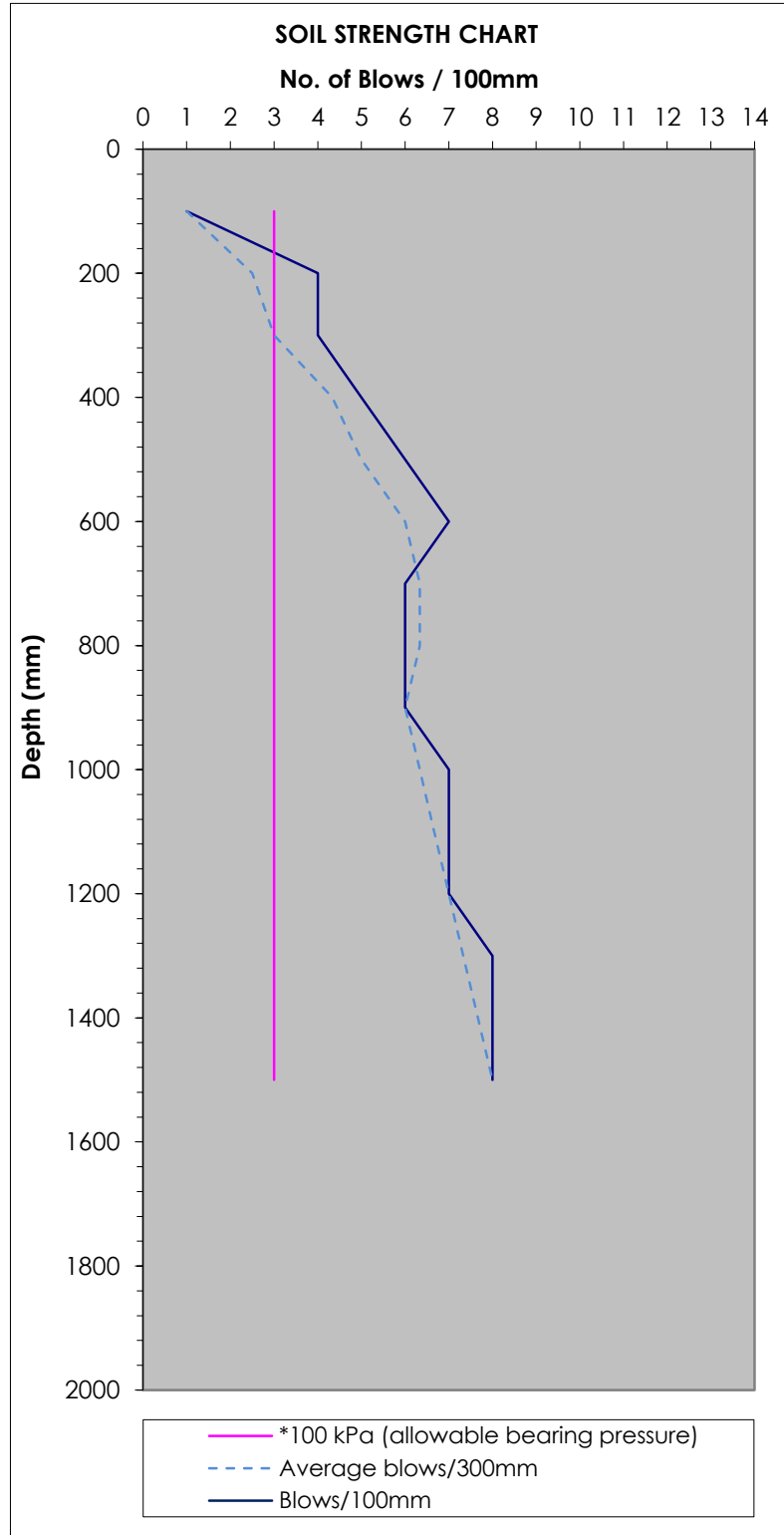


***Stockwell 1977 (3 blows/100mm)**

Scala Penetrometer Test

Job No.	17685 Mega Food Services Limited		
Location:	63 Broadlands Road, Taupo		
Test No.:	S7	Starting Depth:	Existing Ground Level
Date:	28/02/2018	Test by:	AM, KL

Depth (mm)	Blows	Average Blows / 300mm
0 - 100	1	1.0
100 - 200	4	2.5
200 - 300	4	3.0
300 - 400	5	4.3
400 - 500	6	5.0
500 - 600	7	6.0
600 - 700	6	6.3
700 - 800	6	6.3
800 - 900	6	6.0
900 - 1000	7	6.3
1000 - 1100	7	6.7
1100 - 1200	7	7.0
1200 - 1300	8	7.3
1300 - 1400	8	7.7
1400 - 1500	8	8.0

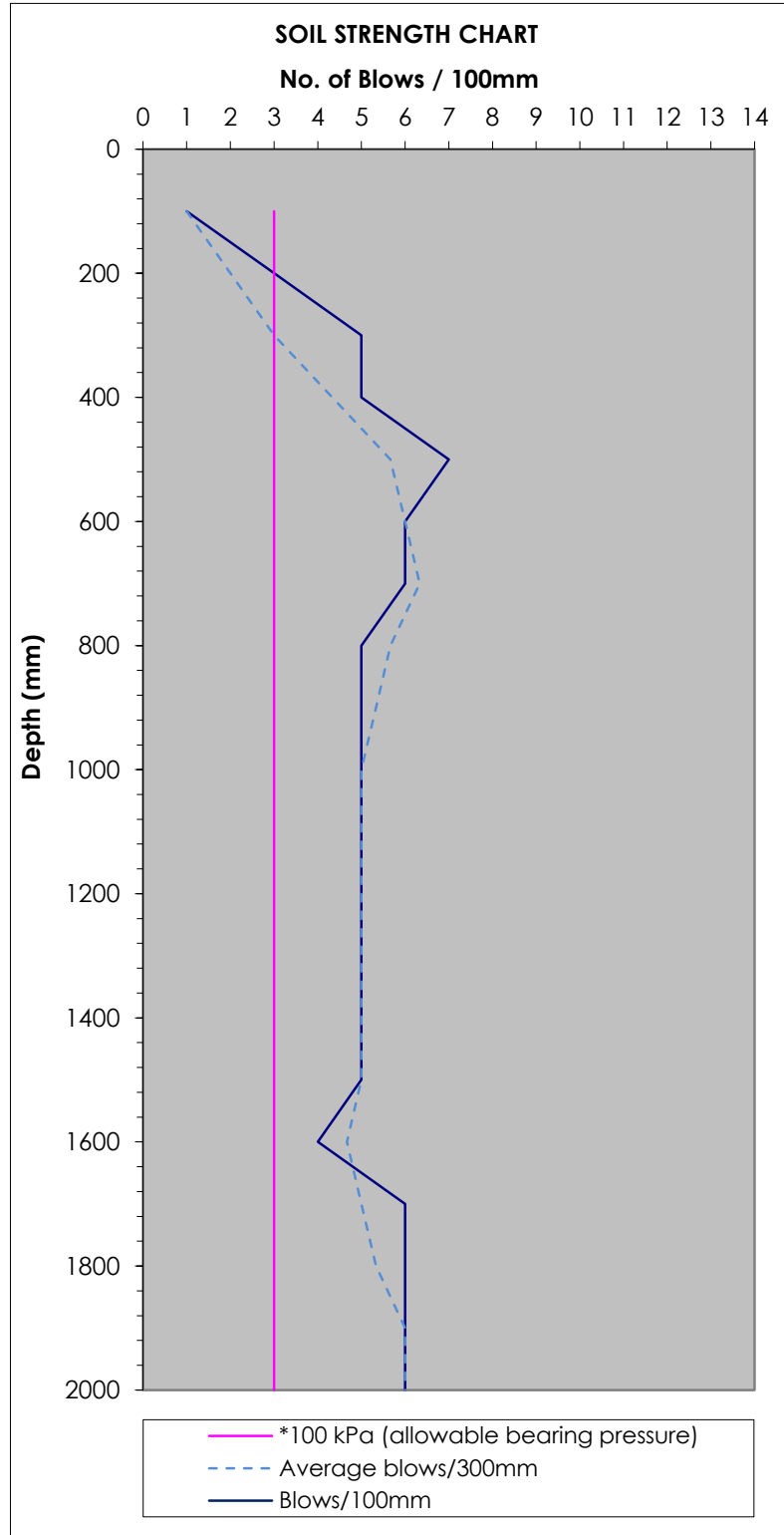


**Stockwell 1977 (3 blows/100mm)*

Scala Penetrometer Test

Job No.	17685 Mega Food Services Limited		
Location:	63 Broadlands Road, Taupo		
Test No.:	S8	Starting Depth:	Existing Ground Level
Date:	28/02/2018	Test by:	AM, KL

Depth (mm)	Blows	Average Blows / 300mm
0 - 100	1	1.0
100 - 200	3	2.0
200 - 300	5	3.0
300 - 400	5	4.3
400 - 500	7	5.7
500 - 600	6	6.0
600 - 700	6	6.3
700 - 800	5	5.7
800 - 900	5	5.3
900 - 1000	5	5.0
1000 - 1100	5	5.0
1100 - 1200	5	5.0
1200 - 1300	5	5.0
1300 - 1400	5	5.0
1400 - 1500	5	5.0
1500 - 1600	4	4.7
1600 - 1700	6	5.0
1700 - 1800	6	5.3
1800 - 1900	6	6.0
1900 - 2000	6	6.0



***Stockwell 1977 (3 blows/100mm)**



SUBMISISON - PLAN CHANGE 43

Provision: Plan Change 43 - Taupō Industrial Zone > Planning Maps

Position:Support

Relief sought

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?:

We want 63 Broadlands Road to be retained in the PDP as industrial land.

Reasons

Include reason(s) for your submission point:

We support the inclusion of 63 Broadlands Road, Taupo in the Taupo Industrial Zone.

Provision: Plan Change 43 - Taupō Industrial Zone > 4h Taupō Industrial Environment and Centennial Industrial

Environment > 4h.3 Subdivision

Rules

Position:Support

Relief sought

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?:

Amend

A definition for 'deep geotechnical investigation' should be provided. We note that New Zealand Ground Investigation Specification Volume 0 2017 provides some comment on deep geotechnical investigation.

Reasons

Include reason(s) for your submission point:

We note that the proposed plan includes subdivision of 63 Broadlands Road as a Discretionary Activity.

We note that including the four above assessment criteria is reasonable considering the known constraints on the site

We note that other matters may also arise.

Provision: Plan Change 43 - Taupō Industrial Zone > Section 32

Position:Support

Relief sought

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?:

Retain

We have reviewed the s32 report and supports its recommendation to include 63 Broadlands Road as Taupo Industrial Land

Reasons

Include reason(s) for your submission point:

We have reviewed the s32 report and supports its recommendation to include 63 Broadlands Road as Taupo Industrial Land

Provision: Plan Change 43 - Taupō Industrial Zone > Planning Maps

Position:Support

Relief sought

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?:

Retain

We note that the planning maps includes 63 Broadlands Road as Taupo Industrial Environment and includes the sensitive land overlay. We seek this proposal to be retained.

Reasons

Include reason(s) for your submission point:

We note that the planning maps includes 63 Broadlands Road as Taupo Industrial Environment and includes the sensitive land overlay. We seek this proposal to be retained.

cheal

Provision: Plan Change 43 - Taupō Industrial Zone > 4h Taupō Industrial Environment and Centennial Industrial Environment > 4h.3 Subdivision

Rules

Position: Seek amendment

Relief sought

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?:

1) Amend

The words 'the assessment must be informed by deep geotechnical investigation and shall also include

We have attached the Preliminary Geotechnical report undertaken for this site to this submission and no such recommendation has been made in this report. Therefore we suggest that the above is struck out.

the assessment must be informed by the deep geotechnical investigation following and shall also include, but not be limited to.

Reasons

Include reason(s) for your submission point:

We note that the proposed plan includes subdivision of 63 Broadlands Road as a Discretionary Activity

Organisation:

Waikato Regional Council

First name: Joao Paulo**Last name:** Silva**Postal address:****Suburb:****City:****Country:** New Zealand**Email:**

joapaulo.silva@waikatoregion.govt.nz

Daytime Phone: 079497179

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
Waikato Regional Council submission on proposed plan changes 38-43 to the Taupo District Plan

File No: 25 12 00
Document No: **25169795**
Enquiries to: Joao Paulo Silva



9 December 2022

Taupō District Council
30 Tongariro Street, Taupō 3330

Email: districtplan@taupo.govt.nz

Private Bag 3038
Waikato Mail Centre
Hamilton 3240, NZ

waikatoregion.govt.nz
0800 800 401

Tēnā koe,

Waikato Regional Council Submission on the Proposed Plan Changes 38-43 (PPC38-43) to the Taupō District Plan

Thank you for the opportunity to make a submission on the Proposed Plan Changes 38-43 (PPC38-43) to the Taupō District Plan. Please find attached the Waikato Regional Council's submission. The submission has been signed under delegation by the Director of Science, Policy and Information. Waikato Regional Council looks forward to being involved in further discussion regarding the development of the plan changes.

Should you have any queries regarding the content of this document please contact Joao Paulo Silva, Senior Policy Advisor, Policy Implementation directly on (07) 9497179 or by email joapaulo.silva@waikatoregion.govt.nz.

Nāku iti noa, nā,

A handwritten signature in blue ink, appearing to read "Tracey May".

Tracey May
Director, Science Policy and Information.

Submission from Waikato Regional Council on the Proposed Plan Changes 38-43 (PPC38-43) to the Taupō District Plan

9 December 2022

Introduction

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to the Proposed Plan Changes 38-43 (PPC38-43). WRC's primary interest is in relation to the Waikato Regional Policy Statement (WRPS). District Plans, including Plan Changes such as this one, are required to give effect to the RPS (RMA s75(3)(c)).
2. The key areas of interest relate to the proposed rezonings for industrial and rural lifestyle development and potential issues regarding development in and adjoining gully systems. The key issues are listed in the body of the submission. The table below lists a range of submission points regarding the proposed provisions of PPC38-43.

Submitter details

Waikato Regional Council
Contact person: Joao Paulo Silva (Policy Implementation)
Email: joaopaulo.silva@waikatoregion.govt.nz
Phone: (07) 9497179

Post: Private Bag 3038
Waikato Mail Centre
Hamilton 3240

I could not gain an advantage in trade competition through this submission
I am not directly affected by an effect of the subject matter of the submission that:
(a) does not adversely affect the environment; and
(b) does not relate to trade competition or the effects of trade competition.

Proposed industrial areas – Taupō Industrial Environments - Plan Change 43

3. **WRC opposes the proposed rezoning of sites 4 and 7 for industrial development. We recommend TDC to assess areas for development that do not pose risks for Significant Natural Areas (SNAs) and for Significant Geothermal Features (SGFs) and are free from geothermal hazards as these can pose risks for human health.**
4. In feedback provided in June 2022, WRC recommended that TDC should explore areas for industrial development avoiding high class soils and geothermal features as this is directed under the WRPS. We understand that TDC assessed eight different areas that could be potentially suitable for industrial development. Out of the eight areas assessed, TDC is proposing to rezone the two highest ranked areas, being sites 4 and 7.
5. The assessment undertaken displaying the industrial land options appears to be driven from an economics lens, with Significant Natural Areas (SNAs) and geothermal features being grouped into the “constrained land” criterion. As a consequence, there was not a comprehensive analysis of effects on Significant Geothermal Features (SGFs) and SNAs. The assessment made no mention of “avoiding adverse effects” or “protecting the significant values” of SNAs and SGFs and included little recognition of the uniqueness of these features. We note that more detailed maps with the sites would have facilitated this assessment. It would be helpful to see maps of each of Site 4 and Site 7, zoomed in/large scale to show the SNAs and SGFs as well as the Wairākei-Tauhara Geothermal System boundary.
6. We consider that the two proposed areas are not appropriate for industrial development. Site 4 adjoins SGFs and SNAs and there is a significant risk of industrial uses encroaching into these sensitive and unreplaceable environments. In addition, site 4 has identified issues connected to geothermal hazards. According to the Geotechnical report¹ provided by TDC, the site was partially included in the hot ground hazard area in a preliminary assessment by Cheal, 2018, and has possible geothermal vents. Site 7 overlaps the hot ground hazard area, and it adjoins a residential environment.
7. Sites 4 and 7 are within the Wairākei-Tauhara Geothermal System, this geothermal system is classified as a Development Geothermal System under the WRPS and the Waikato Regional Plan (WRP). Please see map 21 of the WRPS and Policy 7.4 of the WRP². Method GEO-M15 of the WRPS explicitly directs regional and district plans to avoid adverse effects on Development Geothermal Systems from development and land use.
8. Further, the WRPS contains provisions relating to the care and protections of SGFs, including GEO-01, GEO-P1, GEO-P2 and GEO-P5. GEO-01 promotes the sustainable management of regional geothermal resources by protecting some characteristics of these resources from significant adverse effects, while GEO-P1 provides for managing the effects of development and land use on the regional geothermal resources. Policy GEO-P2 recognises the significance of geothermal features and provides for the protection of geothermal systems. Policy GEO-P5 specifically relates to the protection of Significant Geothermal Features.
9. Furthermore, WRC is concerned about the risks to human health that could be caused by development in hot ground areas. The Section 32 report³ states that:

‘Hot ground and geothermal gases are problematic for development but also have human health implications. Geothermal gases within the soil must be considered during development, with appropriate mitigation measures put in place.

¹ [Microsoft Word - TIPC - Geotechnical Assessment Addendum Report Rev A \(PD review\) \(taupodc.govt.nz\)](#)

² [Waikato Regional Plans](#)

³ [Industrial PC43 S32.pdf \(taupodc.govt.nz\)](#)

Hydrothermal eruptions are also possible within geothermally active areas and are known to have occurred in the Broadlands Road area, most recently in 1981. High pressure geothermal pressure features such as geysers are extremely hazardous to life and development.'

10. The geotechnical report was a preliminary desktop assessment and requires further investigation to fully understand the risks of the sites. We understand that TDC has provided an amendment to subdivision rule 4h.3.7 to further assess the sites during the consenting stage. However, we consider that a more comprehensive approach with a full assessment of sites 4 and 7 would be more appropriate than assessing lots during the consenting stage. We consider that a comprehensive assessment would assist in understanding the risks for each site prior to rezoning. Below is an extract of the conclusion of the geotechnical report:

'Whilst a desktop assessment is appropriate to screen sites for potential hazards, a ground investigation is required to further define the risk that those geohazards pose to industrial development'.

11. In addition, WRC has identified potential issues regarding air quality in connection to site 7. The Taupō airshed, as per the National Environmental Standards for Air Quality, is classified as a polluted airshed as a result of exceedances of the PM₁₀ standard. While the evidence indicates that domestic home heating is the main contributor to exceedances of the PM₁₀ standard in Taupō, transport and industry emissions will also contribute to these exceedances. Depending on the type of industry or commercial activity that is established in this zone there is potential for air quality effects on the adjacent residential area. For example, dust discharges associated with large unsealed sites with truck movements or grain drying and animal feed delivery and storage or odorous activities such as asphalt plants or composting or waste transfer stations.
12. The potential for effects on the neighbouring residential area could also be exacerbated at times by the prevailing wind direction from the northeast. Therefore we recommend that if zone area 7 is established for industrial activity, controls are put in place for ensuring that only light commercial activities with sealed or vegetated sites are permitted. If the intention is to permit heavier industry, then a planted buffer zone would need to be developed to maintain an adequate separation distance as well as providing mitigation of air quality impacts on any future residential development, with the added requirement for sealed or vegetated surfaces on yards within the industrial zone to reduce dust potential.
13. Further we note a potential error with the proposed wording for subdivision rule 4h.3.7. We assume that the intent of the rule is to capture sites 4 and 7, by applying the rule to the Sensitive Land Overlay within Section 14 SO 40438782 and Lot 1 DP 445148. We note that site 4 matches the legal description for Section 14 SO 40438782 and Lot 1 DP 445148 is a site adjoining proposed site 4. We recommend TDC includes site 7's legal description (Lot 2 DP499406) in the rule as well as any adjoining site to site 7 subject to any geothermal hazard. Further, we recommend TDC extends the scope of the rule capturing all sites adjoining the hot ground hazard area, regardless of the connections to this plan change. This will achieve a better overall protection for human health and development.
14. Considering the risks regarding potential losses of biodiversity and geothermal features in connection to developing areas adjoining SNAs and SGFs and the risks associated with geothermal hazards and air quality we oppose the rezoning of proposed sites 4 and 7. We recommend that preferably TDC assesses areas for development that do not pose risks for SNAs and SGFs and do not pose a risk for human health. This position is consistent with our previous feedback.
15. If further assessing other areas is not possible, we recommend TDC to fully assess the risks associated with the sites, including risks associated with geothermal hazards for both sites and risks

of industrial development encroaching on the adjoining SNAs and SGFs to site 4. TDC should then only rezone the parts of the sites that are free from geothermal hazards and must provide strict controls to manage development within and adjoining sites 4 and 7, including provisions for buffers protect the SNAs and SGFs from encroachment and buffers to mitigate air quality issues as well as setbacks for buildings from the hot ground hazard area. In terms of mitigating air quality issues, plan provisions must only allow for light commercial activities as permitted activities with a permitted standard ensuring sites are sealed or vegetated. Heavier industry activities, should have at least a restricted discretionary activity status with matters of discretion ensuring planted buffer zones to maintain an adequate separation distance between buildings and the residential environment while providing for the mitigation of air quality impacts on any future residential development. This should be done by including a requirement for sealed or vegetated surfaces on yards within the industrial zone to reduce dust potential. Further, TDC should amend subdivision rule 4h.3.7 to include the legal description for site 7, being (Lot 2 DP499406).

The proposed rezoning for lifestyle – General Rural and Rural Lifestyle Environments – Plan Change 42

16. **WRC opposes the rezoning of the lifestyle areas. It was considered that there is no demand for rural lifestyle in the Taupō district. In addition, there is the risk associated with land fragmentation and potential losses of productive land, including losses of highly productive land. This will result in a dispersed pattern of development with associated infrastructure and climate change issues.**
17. The economic assessment provided by Property Economics⁴ for the proposed chapter states that overall, there is sufficient development capacity for meeting demand over the next 30 years. This will be primarily within the district's settlements but also within the existing rural lifestyle localities. The report concluded that both growth scenarios analysed would overprovide lifestyle development resulting in dispersed development and losses from intended growth areas that would be unnecessary when providing for the projected additional households. The economic assessment recommends that TDC focuses on providing sufficient capacity to accommodate current rural lifestyle demand and not seek to develop a policy framework that aims to fuel lifestyle growth. We consider that the proposed rezoning is economically driven with the intent to attract more people to the district.
18. WRC considers that having areas of land for lifestyle living in the rural zone can be problematic as it causes car dependency and consequential increases in greenhouse gas emissions as well as issues associated with infrastructure. The WRPS promotes co-ordinated growth and infrastructure. Policy UFD-P2 1(d) provides for management of built environments by ensuring that new development does not occur until appropriate infrastructure is provided to service the development.
19. Policy UFD-P8 recognises Taupō District 2050 and provides for the management of future growth, including in (c) *'avoiding urban development in the rural environment outside of the identified urban growth areas to prevent a dispersed pattern of settlement and the resulting inefficiencies in managing resources.'* Further, in (d) the policy is quite directive in *'avoiding the cumulative effect that subdivision and consequent fragmented land ownership can have on the role of the urban growth areas in providing the supply of land for urban development.'* We consider that fragmenting rural land has the potential to prevent productive uses; once land is subdivided for lifestyle living there is the potential of losing its productive capacity. We are also concerned that having disconnected large areas rezoned for lifestyle living would have a negative impact on the urban growth pattern of the district.

⁴ [Appendix 5 to the S32 Taupo Rural Lifestyle Economic Assessment.pdf \(taupodc.govt.nz\)](#)

20. Furthermore, method UFD-M5 of the WRPS directs rural-residential development away from natural hazards, primary production, and high-class soils. The now in force National Policy Statement for Highly Productive Land (NPS-HPL)⁵ is very directive on the avoidance of rezoning for highly productive land (Policy 6 and Clause 3.7). The Section 32 report⁶ mentions that part of the proposed rezoning is on highly productive land and that TDC will provide an assessment of the NPS-HPL concurrently with this process. TDC has not provided a measurable quantity of the loss of HPL. We would like to see an assessment of the rezoning of HPL for lifestyle living considering the NPS-HPL and WRPS provisions for managing high class soils.
21. We consider that a map displaying relevant features associated with the proposed areas for rezoning would enable a more comprehensive assessment of the proposed rezoning. This should include LUC classification, SNA, SGF and hazards overlays. WRC has requested TDC to provide a spatial layer of the proposed lifestyle areas so we could better assess the proposal. In addition to the layers mentioned earlier, we also need to understand if there are any potential issues regarding any WRC's assets in the area. At the time of preparing this submission, we have not received the information. Therefore, it was difficult for WRC to fully assess the proposed rezoning. Consequently, we oppose the rezoning of the lifestyle areas. Our position may change once we are able to better assess this proposal.

Development associated with gully systems – General Rural and Rural Lifestyle Environments – Plan Change 42

- 22. WRC recommends that the gully systems must be identified and mapped, especially where land use intensifies and encroaches on gullies. Development within and adjacent to gullies should be avoided. Further, WRC recommends the protection of gullies to prevent erosion.**
23. WRC provided feedback on the pre-notification stage for PPC38-43. Part of the feedback related to potential issues associated with development in and near gully systems. As mentioned in the feedback dated 13 June 2022, there is significant risk of gully erosion from increased stormwater flows from new developments. Pumice geology is a specific characteristic of the Taupō district, and these gullies have a higher risk of erosion. This issue can be exacerbated by increased hard surfaces and the resulting increased stormwater runoff volume and velocity. WRC recommended that development should be avoided within and adjacent to the gullies systems. TDC provided a response rejecting our recommendation as it was considered impractical to map all gullies in the rural environment.
24. Further to the issues raised in the feedback, we consider there is the risk of an increased frequency of high intensity weather events as a result of climate change and this could further increase the risk of erosion. Therefore, it is essential to identify and map the gullies and prevent development in and adjacent to these gullies. This could be achieved by identifying and mapping the gullies and requiring building setbacks from gully edges in the district plan. This will achieve alignment with the WRPS principle specific to rural-residential development (h): *'be recognised as a potential method for protecting sensitive areas such as small water bodies, gully-systems and areas of indigenous biodiversity.'* We understand the significance of this work and offer our support for identifying and mapping the gullies. WRC has provided support for Hamilton City Council (HCC) for mapping gullies and we consider we can provide valuable support for identifying and mapping the gully systems in TDC's proposed new areas for rural lifestyle. To this effect, WRC can work in collaboration with TDC from now until the hearings phase of this process to address this issue.
25. We reiterate our recommendation for TDC to avoid any development within or adjacent to gully systems. Development in this sense includes erecting buildings and other infrastructure within and

⁵ [National Policy Statement For Highly Productive Land 2022 \(environment.govt.nz\)](https://environment.govt.nz/national-policy-statement-for-highly-productive-land-2022/)

⁶ [Microsoft Word - Final Section 32 Evaluation Report - PC42 -Rural Chapter.docx \(taupodc.govt.nz\)](#)

adjoining gully systems. Further, WRC recommends the retirement of all natural gullies and that they are protected with appropriate vegetation cover. This will ensure stormwater conveyance does not result in accelerated erosion. Retirement would include no grazing and a minimum 5 metre setback for fencing, buildings, and driveways. In addition, we recommend that vehicle crossings across natural gullies should be either culverts, or bridges in accordance with the Waikato Regional Council Best Practice Guidelines for Waterway Crossings⁷ and any stormwater outflows into gullies must be suitably engineered to prevent erosion in and around the outflow site.

⁷ [Waikato Regional Council Best Practice Guidelines for Waterway Crossings \(waikatoregion.govt.nz\)](https://www.waikatoregion.govt.nz/~/media/25169795)

26. SUBMISSION ON the Proposed Plan Changes 38-43 (PPC38-43)

Text that is shown as underlined is proposed to be added. Text shown with ~~strikethrough~~ formatting is proposed to be deleted.

Plan Section	Support/Oppose	Relief sought	Reasons
Strategic Directions – Plan Change 38			
Section 2.3 at paragraph 2	Support with amendments	Review and reword the second paragraph of Section 2.3.	The second sentence needs rewording as it appears to be missing words. Currently the second paragraph in the section does not make sense.
Section 2.3.2, Objective 1(a)	Support with amendments	Reword the objective as follows: a. contributes to well-functioning and compact urban forms <u>environments</u> that provide for connected liveable communities;	We consider that changing the word ‘forms’ to ‘environment’ will encompass more than the built components of the urban areas. Further, this wording is more consistent with the NPS-UD which focuses on well-functioning urban environments. We note that in the Section 32 report the term ‘urban form’ was used to refer to the likely change in amenity. However, we consider it would be more appropriate to be more explicit about changes in amenity due to increased density/height not being an adverse effect. Please refer to IM-09 – Amenity in the WRPS Change 1.
Objective 2.3.2 (1)	New objective	Include a new bullet point to Objective 2.3.2(1) to read: <u>ensures the protection of Significant Geothermal Features including geothermal vegetation.</u>	WRC considers that the protection of geothermal features should be acknowledged in the Plan. Taupō and Tokaanu are the only two towns in New Zealand apart from Rotorua that overlie large geothermal systems and have within the town rare and fragile geothermal features. The environmental imperative to protect such features should be acknowledged in the Plan.
Objective 2.3.2	New objective	Include a new bullet point to Objective 2.3.2(1) to read: <u>ensure that building, roading and infrastructure developments are directed away from geothermal hazards.</u>	WRC understands that Taupō and Tokaanu overlie geothermal resources. WRC has identified a potential risk regarding potential adverse effects on property and infrastructure if these are placed in areas prone to geothermal subsidence, including at the base of geothermally unstable slopes such as the Hipaua Steaming Cliffs at Tokaanu-Waihi, or on heated ground.

			Therefore, we recommend including a new bullet point to Objective 2.3.2(1).
Policy 2.2.3 (3)	Support with amendments	Amend the wording to read: Recognise and provide for the vision, objectives, and <u>outcomes, and values</u> in Te Ara Whanui o Rangitāiki (Pathways of the Rangitāiki) and Te Kaupapa Kaitiaki documents and to give effect to Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy for the Waikato River.	WRC considers the policy should be amended to achieve better consistency with Section 181 of the Ngāti Tuwharetoa Claims Settlement Act 2018.
Policy 2.3.3 (7)	Support with amendments	Amend the wording as follows: 7. Provide for the development of Papakāinga <u>and supporting services on</u> māori land to facilitate māori occupation on their ancestral lands.	We consider that including ‘and supporting services’ after papakāinga on (7) will give better effect to WRPS Method UFD-M21 which provides for sustainability of marae and papakāinga and directs district plans to take into account the need for additional services to support papakāinga.
Policy 2.3.3 (11)	Support with amendments	Amend the wording as follows: 11. Require the design and location of activities to avoid or mitigate natural hazards to an acceptable level of <u>current and future risks</u> to life, property and the environment.	WRC considers that the term ‘current and future risk’ should be included to the policy to ensure that climate change is adequately considered. This will achieve alignment with WRPS Change 1- IM-O5 – Climate change.
2.3.3 Policy	New Policy	Include new policy (or similar) as follows: <u>Avoid new development and subdivision of areas in close proximity to Significant Geothermal Features as mapped in the Waikato Regional Plan.</u>	WRC considers that the protection of geothermal features should be acknowledged in the Plan. Taupō and Tokaanu are the only two towns in New Zealand apart from Rotorua that overlie large geothermal systems and have within the town rare and fragile geothermal features. The environmental imperative to protect such features should be acknowledged in the Plan. This will achieve better alignment with the WRPS.

2.5 Strategic Direction 5 Significant and Local Infrastructure, 1st bullet point	Support with amendment	Amend text to read: "State highways (1, 5, <u>30</u> , 32, 41, <u>46</u> and 47)."	WRC has identified that State highways 30 and 46 are missing from the text. We consider that the reference should be included.
2.5 Strategic Direction 5 Significant and Local Infrastructure, 4 th bullet point	Support with amendment	Amend wording by changing the percentage from 20% to 27% and providing wording that recognises the local and national importance of Taupō's electricity-producing capability.	WRC considers that the Taupō District provides 27% of the national total electricity (using 2020 figures). Almost all of this comes from geothermal and hydro. Geothermal will increase with the Tauhara II development and proposed Ngā Tamariki expansion. In addition, a large solar farm is planned for the district. The District Plan should explicitly recognise the importance of the district's electricity-generating capacity to the local and national economy.
2.6 Strategic Direction 6 Natural Environment Values	Support with amendment	Amend wording after the first sentence to include the sentence: <u>Our rare habitats include 42% of the nation's geothermal vegetation, a rare and vulnerable ecosystem type.</u> And include a new policy in 2.6.3. to read: <u>Map as SNAs all geothermal areas that meet the Waikato Regional Policy Statement definition of SNA, and ensure their protection.</u>	WRC understands that the Taupō District contains most of the country's geothermal vegetation. However, this rare and vulnerable ecosystem type is not appropriately referred to in the chapter. Further, we understand that a review of the SNA framework is out of scope of this process. However, we note that all geothermal areas that meet the WRPS definition of SNA should be mapped as SNA when appropriate. Therefore, we consider it appropriate to include a new policy to the chapter now. WRC recommends including a new policy in 2.6.3.
General		Include provisions to address the following to give effect to NPS UD, WRPS and Change 1: <ul style="list-style-type: none"> • Urban development supports emissions reduction through urban form, design and location. • New development is located in and around existing settlements. • Enable a diverse range of dwelling types and sizes. 	WRC considers that the chapter should give better effect to the NPS-UD and WRPS change 1.

		Responsiveness to proposals that provide significant development capacity with reference to WRPS Change 1 UFD-M74 – Tier 3 out of sequence or unanticipated development and APP14 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Non-Future Proof tier 3 local authorities).	
Section 32 report – strategic direction		Amend wording in the report to appropriately connect Plan Change 1 to the WRP, instead of WRPS.	4.6.1 incorrectly states that Plan Change 1: Healthy Rivers is a change to the WRPS. This is a change to the Waikato Regional Plan (WRP). The first change to the WRPS is WRPS Change 1 for NPS UD and Future Proof Strategy update which was notified 18 October 2022.
General Rural and Rural Lifestyle Environments – Plan Change 42			
General Rezoning for Lifestyle blocks	Oppose	Not to rezone the proposed areas in the rural environment to lifestyle environment. Provide a map displaying significant overlays associated with the proposed areas for rezoning, including LUC classification, SNAs, SGFs and hazards overlays.	Please see the comments in the body of this submission.
General Development in gully systems		All gully systems with the proposed are to be identified and mapped such that any prospective landowner would have certainty. Further, the plan change to include rules to ensure that any development is excluded from the gully areas, and that should any development be allowed that a resource consent is required.	Please see the comments in the body of this submission.
Rules 4b.5.1i, 4b,5,2i, 4b.5.3i and 4b.5.6i and matters of control/discretion	Oppose in part	Change the activity status of the rules and include text as below: <ul style="list-style-type: none"> (a) Rules 4b.5.1i, 4b,5,2i, 4b.5.3i and 4b.5.6i should be changed to restricted discretionary activities; and (b) The matters over which the Council retains discretion for each rule should include the following (or similar): 	WRC considers the subdivision rules do not adequately take account of the possibility that the potential for natural hazards on particular land may render the land entirely unsuitable for residential development, particularly when the potential effects of future climate change are also considered. WRC is increasingly finding that land, for which subdivision consent has been obtained, is unsuitable for

		<p><u><i>The suitability of the subject land for residential purposes having particular regard to its existing and future susceptibility to natural hazards, including consideration of the potential exacerbation of such effects due to climate change.</i></u></p>	<p>development due to its susceptibility to significant natural hazards, particularly flooding.</p> <p>In WRC’s submission, as noted above, this is a fundamental issue concerning the suitability of land use that falls within the ambit of territorial functions to consider in their decision-making. We are concerned that the relevant subdivision rules do not account for this.</p> <p>Controlled activity rules 4b.5.1i, 4b.5.2i, 4b.5.3i and 4b.5.6i enable subdivision of land in various circumstances. The first three of those rules are subject to matters of control which include reference to natural hazards:</p> <p><i>b) The identification of any natural hazards or contaminated sites and how these may affect the stability of the land and suitability of any future building sites, including any information provided by a suitably qualified person whose investigations are supplied with the subdivision application.</i></p> <p>Rule 4b.5.6i does not include reference to natural hazards at all.</p> <p>Irrespective, in all cases, given these are controlled activities, there is no ability to decline any subdivision application under these rules, including for reasons related to the land’s existing or future susceptibility to natural hazards.</p>
Matters of control and discretion	Oppose in part	Include a reference to “natural wetlands” to the matters of control and discretion for the proposed controlled and restricted discretionary activity rules for subdivision.	WRC highlights that the National Policy Statement for Freshwater Management 2020 (NPSFM) and the National Environmental Standards for Freshwater 2020 (NESF) came into force in September 2020. Together, these instruments provide a national policy and regulatory framework to ensure the identification and protection of “natural wetlands” (among other things). ⁸ More specifically, this includes ensuring that <i>the loss of extent of natural wetlands</i>

⁸ Refer 2.2 Policy 6, policies 3.22 and 3.23 of the NPSFM; and Regulations 37-56 of the NESF.

			<p><i>is avoided, their values are protected, and their restoration is promoted</i> except in specified circumstances. The WRPS and regional plans are required to be consistent with this policy direction and district plans are required to have regard to the objectives and policies of regional policy statements and plans. The Regulations apply to various activities on land (including vegetation clearance, earthworks and land disturbance when those activities occur within, or within specified distances of natural wetlands), some of which would clearly fall within the scope of rules in the District Plan. To the extent that these activities may occur in the absence of subdivision, they will be managed via the Regional Council which has a direct rule to implement these regulations. However, we submit that, in respect of the controlled and restricted discretionary activity rules for subdivision, there must be appropriate reference to potential effects on natural wetlands that may occur as a natural consequence of the subdivision and use of land for residential (or other) developments. This would enable such effects to be addressed at the subdivision consent stage where appropriate and subdivision designed in such a way as to avoid impacts on existing wetlands.</p>
Matters of control and discretion	Oppose in part	Include a reference to gully erosion to the matters of control/discretion for the proposed controlled and restricted discretionary activity rules for subdivision.	<p>WRC notes that recently developers have wished to use highly erosive gully systems for stormwater management and infrastructure. In many cases, this will exacerbate erosion, creating risks to both the development in question, and downstream infrastructure and property. There are occasions where interference with the gully systems should simply be avoided in the development design proposals. Also, many gully systems are protected under Land Improvement Agreements with WRC, protection which is threatened by their use for subdivision purposes.</p>
Taupō Industrial Environments – Plan Change 43			

<p>Overall</p> <p>Rezoning of proposed sites 4 and 7</p>	<p>Oppose</p>	<p>That site 4 and site 7 are not rezoned for industrial purposes. This is our preferred relief. If not possible to assess other areas for industrial development, that TDC only rezones parts of the sites that are free from geothermal hazards and provide strict controls to manage development within and adjoining sites 4 and 7, including planted buffers protecting the SNAs and SGFs from development and buffers to mitigate air quality issues as well as setbacks from the hot ground overlay. Further, plan provisions must only allow for light commercial activities as permitted activities with a permitted standard ensuring sites are sealed or vegetated. Heavier industry activities, should have at least a restricted discretionary activity status with matters of discretion ensuring planted buffer zones to maintain an adequate separation distance between buildings and the residential environment while providing for the mitigation of air quality impacts on any future residential development. This should be done by including a requirement for sealed or vegetated surfaces on yards within the industrial zone to reduce dust potential. Further, TDC should amend subdivision rule 4h.3.7 to include the legal description for site 7, being (Lot 2 DP499406) as per the point below.</p>	<p>Please see the comments in the body of the submission.</p>
<p>Subdivision rule 4h.3.7</p>	<p>Oppose in part</p>	<p>Amend the rule as follows: 4h.3.7 Any subdivision of land identified as “Sensitive” within the Taupō Industrial Environment is a discretionary activity and will be subject to the recommendations of appropriate technical assessments including, but</p>	<p>Please see the comments in the body of the submission.</p>

		<p>not limited to: a geotechnical assessment, and an ecological assessment where the activity affects land identified as a Significant Natural Area. In applying this Rule to the Sensitive Land Overlay within Section 14 SO 40438782 and Lot 1 DP 445148 and Lot 2 DP499406, the assessment must be informed by deep geotechnical investigation and shall also include, but not be limited to:</p> <ul style="list-style-type: none"> • establishing a ground temperature profile starting from the margins of the Hot Ground Hazard Area (District Plan maps); • determination of the groundwater profile and susceptibility to liquefaction and risk of subsurface water flows; • establishing an understanding of the most likely future state of thermal features; and • a stormwater management plan. 	
General			
General		Give regard to Change 1 to the WRPS as a 'proposed policy statement' in the proposed plan changes.	<p>Change 1 to the WRPS has been notified and so is a 'proposed policy statement'.</p> <p>District Councils are required, when preparing a change to the district plan, to have regard to the WRPS under section 74(2)(a)(i) of the RMA.</p>
National Planning Standards		Update PPC38-43 to the new plan format provided with the National Planning Standards 2019.	WRC considers that PPC38-43 should follow the new plan format provided with the National Planning Standards.

Further Information and Hearings

27. WRC wishes to be heard at the hearings for the Proposed Plan Changes 38-43 (PPC38-43) in support of this submission and is prepared to consider a joint submission with others making a similar submission.
28. WRC could not gain an advantage in trade competition through this submission.



First name: John

Last name: Lenihan

On behalf of:
Rangatira Block Trusts

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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

As we are submitting on behalf of 7 Maori Trusts with 8000 owners, we would like 2 hours at the hearing.

Attached Documents

File
2022-12-07_Submission Taupo Proposed District Plan Changes 38 to 43

Taupo District Council
Private Bag 2005
Taupo Mail Centre
Taupo 3352

Email: districtplan@taupo.govt.nz

Dear Sir/Madam

Submission to Proposed Taupo DC Plan Changes 38 - 43 (PPC 2022) – RMA Form 5

Submitters

- Rangatira E Trust
- The Proprietors of Hirharama Ponui Block
- Rangatira Point Incorporation
- Paenoa te Akau Trust
- Rangatira 8A14A (Paenoa Te Akau Block)
- Rangatira 8A16 (61 Huka Falls Rd)
- Rangatira 8A17 (Nukuhau)

Consultant lodging submission:
C/O RCG Ltd
PO Box 9672 Newmarket 1148
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Email: johnle@rcg.co.nz
Ph: 021817336

Introduction and Background

The above submitters could not gain an advantage in trade competition through this submission.

The submitters are all significant Maori land holding trusts who own all the undeveloped land on the western side of the river, from Rangatira Park, part of Nukuhau, through Acacia Bay to Rangatira Point; an area of 1500 hectares. The Submitters represent the interest of over 8,000 individuals who are mana whenua of land in Taupo and are directly impacted by these plan changes.

The Council's Strategic Plan 2050, recognised these landowners as significant with an important interest in the development of the city and region.

The submitters have been engaged with Council executive for the last 18 months on their development aspirations for their land. Master planned communities of commercial and residential use have been provided to the Council for comment and feedback. The

Submitters are a group with a large landholding who are working together to bring change and sustainable management of land capable of development to the district. The aspirations of the Submitters is to provide for the community at large and the mana whenua. This requires exploration of commercial opportunities and arrangement with Council and the Crown to open this land up.

Taupo is not alone in going on this journey. Tauranga has worked with Maori land trusts to open land for development in Papamoa. Hamilton and Rotorua have worked with mana whenua to develop Maori land blocks. The Submitters wish to work with Council to deliver the Taupo 2050 strategy.

The recent engagement with the Council has been instigated by the Submitters. However, the Council's response had been limited and not particularly open. Taupo District Council has not been collaborative. There has been a long history of Council not informing the Submitters on planning issues that impact them, or consulting the Submitters proactively. As the Council is aware there is an explicit duty to involve mana whenua in planning decisions. A partnership that promotes collaborative decision making would benefit the Taupo District and all its people.

Commentary on Proposed Plan Changes

Proposed Taupo DC Plan Changes 38 - 43 (**PPC 2022**) is described by the Council as being the first bundle in a series of plan changes aimed to ensure the District Planning framework is operating efficiently and effectively. Since the plans were notified, the Natural and Built Environment Bill has been introduced and open for submission, along with the Spatial Planning Bill. In looking at the resource management reforms, it is clear that the aim of the new framework is to ensure mana whenua have a say over the development of their land and any district in which they own land. The new framework promotes partnership and collaboration.

PPC 2022 is an opportunity for the Taupo council to lead. As such the submission focuses on changes the Submitters wish to see implemented to allow for a wider range of activities to take place on their land – instead of limiting development to Papakainga with no access to commercial, industrial or lifestyle activities. The Submitters view is that the Council has to engage with the Submitters as land owners to ascertain the needs of the whole community.

Instead, the Council has set a new Strategic Direction (**PPC 38**) which seeks to limit the capacity and use of the property owned by the Submitters. No basis for this approach has been outlined in the section 32 reports.

There is no meaningful mention in the PPC 2022 as to engagement with the Submitters. For instance whilst some members of the community were involved in the pre-consultation phase between 13 May and 13 June 2022 and preparation of background documents that became the section 32 reports, the Submitters were not approached – not as a collective or as individuals. Some of the Submitters, using their own initiative met with Council staff on 11 April 2022, but that was a short engagement and did not result in meaningful follow up discussions. That one meeting certainly has not transformed into planning provisions that allow mana whenua to provide for their beneficiaries into the future by using land to provide opportunities.

Draft plan provisions were not as stated in the section 32 report, tested with the Submitters. This formal submission process is the first opportunity the Submitters have had to provide feedback to the Council on PPC 2022. The Submitters consider the Council's approach to be disrespectful to the mana whenua interests. Meaningful consultation is required to develop a framework that allows the Submitters to participate in the same manner as other parties in the District.

The Submitters, despite owning the most significant land-holding adjacent to Taupo township, have not been invited to be part of the Iwi Reference Group, or considered an "Iwi Partner" and this is in spite of the Submitters making this request in writing for inclusion in the District Plan Change process.

The submitters consider they are directly affected by the PPC 2022 and request to be heard in relation to this submission. Two hours is requested to be heard given the number of land owning trusts that form the Submitters group.

The submission is a summary of issues only. The Submitters may produce further submissions and evidence at the hearing.

Comments on each plan change as follows

PC 38 Strategic Directions

Submission	Stance	Reasons	Decision Requested
2.1 Tangata Whenua	Support		
2.1.2 Objectives	Support		
2.1.3 Policy Item 5	Object/Amend	This policy wording is ambiguous and can be interpreted that Maori Multiple owned land should remain as under-utilised and un-developed.	Amend by adding to the policy that public structure planning processes would enable the re-zoning of land and provision of infrastructure to remove constraints and enable development of Multiple Maori owned land.

Submission	Stance	Reasons	Decision Requested
2.1.3 Policy Item 6	Object/amend	The wording of this policy does not recognise that the District Plan and supporting documents such as TDC 2050 growth Strategy (2018) do not have the provisions to enable development, the current provisions have restrained development.	Amend by removing “within the provisions of the plan”
2.3 Urban Form & Development	Object/amend	The District Plan does not provide a framework for urban development on multiple Maori owned land. Existing urban areas including the Town Centre have been protected at the expense of Maori land.	Amend to add to the second paragraph after 2050 “ and supports urban development on Multiple Māori owned land.”
2.3.2 Objectives Item 2	Object/amend	TD2050 (2018) discounted multiple maori owned land from future development, and infrastructure solutions have excluded maori landowners from involvement with capacity strategy and solutions	Amend after 2050 2018“ and to support urban development on Multiple Māori owned land, to maximise efficient use of potential unzoned & unserviced Maori land along with existng...”
2.3.2 Item 6	Object/amend	Multiple Maori owned land is currently not part of the planned urban built form & so this objective is written ambiguously and can be interpreted to be exclusionary of Maori land. In order for something to	Item 5 already supports the Town Centre Environment as the “primary” centre. Remove objective 6 as un-necessary and poorly defined.

		<p>detract from form and function – that form and function has to be detailed.</p> <p>This is a poorly written objective.</p>	
2.3.3 Policy Item 3	Object/amend	<p>TD2050 (2018) discounted multiple maori owned land from future development, and infrastructure solutions have excluded maori landowners from involvement with capacity strategy and solutions</p>	<p>Amend after 2050 2018“ and to support urban development on Multiple Māori owned land, to maximise efficient use of potential unzoned & unserviced Maori land along with existing ...”</p>
2.3.3.Ploicy Item 4	Object/amend	<p>The introduction of “fragmented development” requires some explanation, Taupo by virtue of geography and geology is fragmented. The current lack of exisitng and planned infrastructure on the western side of the river is resulting in inefficiencies elsewhere and detrimental to the development of Multiple owned Maori land.</p> <p>Item 5 covers the issue of efficient and effective infrastructure and landuse.</p>	<p>Remove item 4</p>
2.3.3 Policy Item 7	Object/amend	<p>Development on maori land should not just be restricted to Papakaiinga.</p>	<p>Remove “the “ and “of papakainga”</p>

Submission	Stance	Reasons	Decision Requested
2.3.3 Policy Item 8	Object/amend	<p>This is a poorly drafted policy that confuses non-residential “activity” with the “built form” of residential neighbourhoods, and the use of the term “boundaries”. Either this is a policy about the scale of built form or a policy about the scale of activities.</p> <p>What residential neighbourhoods are being “protected” from is also unclear. Maori land has a history and culture of being mixed use. Contemporary urban planning advocates for mixed use activity , with the scale of activity and therefore the scale of built form being determined by transportation systems, public service provisions, and environmental attributes.</p>	Amend to remove this policy
2.5 Infrastructure	Object/Amend	There is no mention of developing infrastructure to enable development of Māori land, and recognition that Māori land has been disadvantaged historically by investment decision making of Council and its District Plan	Include maori land in the objectives and policy section wording.
2.6	Natural Object/Amend	Maori land has been left	Objectives and Policy

Environment Values		in a more natural state due to a framework of statutes and planning practices and a legal system based on freehold property . This has restricted the development of Maori land. The loss of environmental values, character and amenity on other land should not be a burden to remedy on Maori landowners, where maori land is treated as reserves or to be protected.	wording needs to be changed to include the ability for Maori-landowners to determine how they develop their land and what should be protected, enhanced or mitigated.

PC42 General Rural & Rural Lifestyle Environments

Submission	Stance	Reasons	Decision Requested
3b.1 Introduction	Object/Amend	The District Plan should recognise that Maori land has most often been forced into a rural zoning status by statutes, court rulings and planning frameworks, usually against the wishes of Maori landowners or without consultation. The new provisions of the RMA and other relevant legislation has recognised that Māori are entitled, within certain limits, to develop practices and exploit their resources by acquiring and adapting new skills and technology in the same way as other communities	Amend wording to incorporate this reasoning.
3b.1 Rural Lifestyle	Object/Amend	Council has identified 5000 hectares of rural land for re-zoning as Rural Lifestyle of which	amend to reject the all the sites identified in the maps for re-zoning and rezone the

		4000 hectares are on the western side of the Waikato River, non of this land is multiple owned maori Land. All of it sits further beyond The Rangatira blocks. There has been no consultation in regards to the proposed zone maps despite the submitters idenitfing to Council their desire for this zone on their land, which is capable of providing all the desired outcome in the plan change documents	Rangatira blocks
Policy 3b.2.9 (e)	Object/Amend	The introduction of Rural Industry will require frequent regular vehicle movements to function. The existng Rural Environment also functions on regular and frequent vehicle movements . Defining a Rural character based on infrequent vehicle movements is ambiguous and poorly considered	Remove item (e) from the objective.
Rule 4b.2.8	Object/amend	The use of “Commercial and Industrial” purpose is ambiguous relative to the new definition of Rural Industry. A maximum building size in standard 4b2.3 of 5000sqm gross appears contradictory with this standard of a restriction to 100sqm gross. This standard is the same as the Rual Lifestyle standard which suggests there has been an error.	Amend wording for clarity and co-ordination of standards.

PC 43 Industrial.

Submission	Stance	Reasons	Decision Requested
	Object/Amend	The District Plan should recognise that Maori land has most often been forced into a rural zoning status by statutes, court rulings and planning frameworks, usually against the wishes of Maori landowners or without consultation. The new provisions of the RMA and other relevant legislation has recognised that Māori are entitled, within certain limits, to develop practices and exploit their resources by acquiring and adapting new skills and technology in the same way as other communities	Amend to zone part of the Rangatira E land as industrial as the section 32 evaluation & methodology are flawed and had no regard for the RMA requirement to consider the development of maori owned land as to the following;

This Plan Change is to simply rezone rural land to increase the Industrial land supply in Taupo.

Council identified 8 sites with proximity to the urban area with proximity to supporting infrastructure. 7 of the sites are all on the east side.

The Rangatira E option was added due to it being tabled to Council in a meeting in April 2022.

A Total of 285 hectares was considered in the section 32 report with only one Maori owned block (20% of the total land considered) with a narrow and non-evidence based assessment

24.5 hectares on 2 blocks made the final selection for re-zoning . Council had identified that 80-90 hectares of new industrial land would be needed by 2053. The 24.5h may fulfil the 10 year projected requirement only.

Objection is based on a flawed section 32 evaluation & methodology that excluded the benefits to the Maori community, their economy & environment has not been identified & assessed- despite our masterplan shared with Council consultants preparing s32 reports. No input from iwi owners has been included. The rationale and analysis from the Maori/iwi perspective is lacking entirely. Maori involvement in Industrial development has not been addressed.



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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

None.

Consultation Document Submissions

Provision: Plan Change 39 - Building Coverage - Residential Environment

Points: 46.1

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

That if the council approves an increase in the building coverage maximum for new (and I guess this means

established sections in the applicable area) it must set up a measurable target, and meet it, for the planting of large trees and - where size is impractical - gardens on road verges, median strips and parks and reserves.

As an example, for every section where the new max building coverage applies, the council should have to plant and maintain a minimum of two large trees (growing to at least 10m in height) on a nearby green space with initial preference given to the road verge or road median adjacent to the section in question.

As an offset, the trees that can't be accommodated close to the section in question should be planted in town.

Residential Building Coverage

An increase in Residential Building Coverage will lead to more run off from hard surfaces, this has to be mitigated in some way.

It will also lead to less room on sections for trees and playing areas for children. This can be mitigated by more open space reserves and tree plantings.

New developments should be required to have open treed space in mitigation.

Another mitigation for this would be stronger protection for trees on both private and public land.

Too many traffic islands are concreted over. Too many road verges don't have trees. In road planning more consideration should be given to planted medians to calm traffic and provide shade.

The council should be by its actions encouraging the care of older family members by their children (in the community). This move could assist in that but needs to be accompanied by changes to the rating system for water and rubbish rates where a house provides two joined but separate living areas - one for the use of older parents.

Include reason(s) for your submission point

The larger you make the allowable house coverage of a residential site the less room there is for gardens and trees that will reduce the visual impact of the built environment and contribute to soaking up carbon. People with small sections generally find large trees hard to manage and look after. Trees provide innumerable benefits to the environment and social and mental wellbeing. This means it is incumbent on the regulating authority which has increased the allowable building coverage percentage to provide these large trees on verges, road medians and parks and reserves ie the relief sought by this submission.

Provision: Plan Change 38 - Strategic Directions

Points: 46.2

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

It is time for the council to adopt degrowth as an overarching philosophy. Degrowth is a planned and democratic reduction of unnecessary production in rich countries designed to bring the economy back into balance with the living world in a safe and equitable way.

To me this would involve a sincere and dedicated commitment to a reduction in energy use and the installation of devices that unnecessarily use reticulated energy when a different design could take advantage of human

energy, greater emphasis on green buildings (better insulation, use of natural solar warming etc, the catching and use of roofwater) and the provision of green spaces and trees. More use of timber as a construction material rather than concrete and steel.

Limits on unnecessary lighting, heating and air conditioning in public buildings and office buildings where better design such as having openable windows would suffice.

Bans on consumer goods that fail to meet standards for recyclability or repairability. Council compost collections for those who can't or won't compost themselves. Penalties for those who don't sort their household refuse adequately, penalties for builders and developers who don't sort and reuse/or recycle waste or leftover building materials.

Trees planted on every roadside verge in the Taupo town area and in the medians in open car parks.

That the Council promote self-contained wastewater systems such as worm based ones to mitigate increased wastewater from subdivisions

Benefits include:

drip feeding low level nutrients to the soil gradually

less landfill as some of these systems can compost as well

resilience for the homeowner

reduction in water use for irrigation as household water is recycled

ecologically sound

reduced pressure on existing council wastewater infrastructure

sustainable

NZ companies promoting this technology include wormsmart.nz, biolytix.com, naturalflo.co.nz

Tukairangi Trust strongly supports the Waikato Regional Council feedback in it's entirety as below and including comment 142

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to the first bundle of plan changes (FBPCs). WRC's primary interest is in relation to the Waikato Regional Policy Statement (WRPS). District Plans, including Plan Changes such as this one, are required to give effect to the RPS (RMA s75(3)(c)).
2. WRC is supportive overall of the draft framework for the first bundle of plan changes. We believe the new set of provisions has the potential to reduce the number of resource consent applications in some instances. This will reduce regulatory red tape and achieve better outcomes for the community. WRC is supportive overall of the draft framework for the first bundle of plan changes. We believe the new set of provisions has the potential to reduce the number of resource consent applications in some instances. This will reduce regulatory red tape and achieve better outcomes for the community.
3. However, WRC considers that there are areas in the draft framework that require further analysis from TDC. One of WRC's concerns is regarding subdivision provisions. The rule framework does not consider the possibility of natural hazards making land unsuitable for development. We also consider the framework should capture the potential effects of future climate change on development. In addition, we note the importance of having a reference to natural wetlands and gully erosion in the matters of control and discretion for the draft controlled and restricted discretionary activities. Please see our table below for full details
4. WRC also considers there should be provisions in the FBPCs directing development away from natural gully systems and that gully vegetation should be managed to avoid exacerbating actual or potential erosion (and related) risks.
5. Another concern is in relation to new industrial areas being proposed within and adjoining Significant Natural Areas (SNAs) and Significant Geothermal Features (SGFs). We consider there is a significant risk for loss of indigenous biodiversity and adverse effects in the geothermal features, including the loss of geothermal vegetation. Therefore, WRC recommends TDC considers other areas for industrial development that would not pose a risk for local indigenous biodiversity and geothermal features.

Comment on Strategic Directions

2.4 4 Climate Change

Statement

in NZ GHG emissions from transport were up 62.1% from 1990. Transport emissions are the fastest growing source of GHG emissions in NZ. Nearly 70% of all transport CO₂ are from cars, SUV's vans and light trucks. A typical passenger vehicle emits 4.6 tonnes of CO₂ /year.

2.4.2 Objective

1. Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes.

Question , How can the inevitable higher emissions from increased vehicle movements from increase in population from Rural Lifestyle subdivision, travelling to town be reconciled with this objective?

Suggestion-Unless a toll is imposed on private vehicle use and this used to subsidise public transport.

2.4.3 Policy

1. Land use activities which create positive climate change outcomes will be supported and encouraged.
2. Land use activities which will unduly accelerate the effects of climate change will be discouraged.
3. Subdivision use and development of land must demonstrate resilience to the effects of climate change over time.
4. Urban and built development must be designed in a manner which considers the need to reduce greenhouse gas emissions associated with that development and resulting land use.

2.4.3. 1 Question. How can this ever be measured and who will measure it? Unless an Energy Audit or Emissions budget is provided for a change in land use.

2.4.3. 2 Surely any type of subdivision/development that does not offset emissions by tree planting or buying carbon credits will not result in positive climate change outcomes.

The only development of land that would result in positive climate change outcomes would be land use change to forestry or retirement and revegetation of some kind.

2.4.3 3 As WRC feedback ; Subdivision use land development that encroaches on natural ephemeral waterways, wetlands or LIA s that are prone to erosion will not be resilient to climate change.

2.4.3 4 Considering the need to reduce GHG in urban and built development will not result in reduction in GHG emissions. It has to be done in practice. Who will police these designs ?

The only design that would reduce GHG emissions would be use of wood products in design and construction.

2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE

2.5.2 Objectives

1. The wider benefits and strategic importance of significant infrastructure to the District and nationally, are recognised in decision making and land use planning.
2. The sustainable development, operation, maintenance and upgrading of renewable electricity generation resources and activities are recognised and encouraged.
3. Land use in the District will not reduce the safe and effective functioning of significant and local infrastructure.
4. Local and national transport infrastructure located in the Taupō District operates in a safe and effective manner.

Suggestion - have an objective that encourages reductions in power consumption to reduce the need for building more power stations

and vehicle movement to reduce GHG emissions and make roads safer

2.6 STRATEGIC DIRECTION 6 NATURAL ENVIRONMENT VALUES

2.6.2 Objectives

1. Recognise the importance of the district's natural values and landscapes and their significance to the Taupō Districts communities and identity.
2. The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna from the adverse effects of inappropriate development.
3. Activities which will lead to the enhancement of indigenous biodiversity values will be recognised and provided for.
4. Recognition of the extent of indigenous vegetation and habitat under Māori land tenure, and the need to provide for the important relationship of Māori and their culture and traditions with their ancestral lands and waahi tapu.
5. The protection of outstanding landscape areas from inappropriate land use and development which may adversely affect their landscape attributes.
6. Recognition of the relationship of tāngata whenua with the natural values of their ancestral lands, waterbodies, sites, cultural landscapes, and other natural taonga of significance.

7. The natural character of riparian margins are preserved, and enhanced where appropriate, and protected from inappropriate subdivision, use and development.

2.6.3 Policy

1. Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will have more than minor effects on the ecological values and processes important to those areas.
2. Support and facilitate those activities which will lead to the long term protection and or enhancement of indigenous biodiversity values. Ch2 Strategic Directions draft for consultation_.docx 1
3. Recognise and provide for tāngata whenua in their role as kaitiaki of the natural values on their lands and the wider district. 4. Development must not have any more than minor adverse effects on the attributes of identified outstanding landscape areas.
5. Encourage the protection, enhancement and restoration of indigenous biodiversity, including by supporting opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki in restoring, protecting and enhancing areas of indigenous biodiversity.
6. Ensure that activities within outstanding natural features and landscapes recognise and maintain their important values and characteristics. 7. Support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki in respect of the features or landscapes.
8. Recognise the contribution made by landowners to the protection and enhancement of areas of natural values and landscapes.

Question 2.6.2. 3 How will activities that lead to the enhancement of indigenous biodiversity be specifically provided for ?

Question 2.6.3 2 How specifically will TDC support and facilitate?

Comment ; Industrial Land Supply / Natural Environment Values

The Industrial Zones identified on Broadlands Rd ,adjacent to Broadlands Geothermal Reserve an SNA vested to Iwi is inappropriate without some protection offered .

In the past industrial businesses/properties bordering significant geothermal sites have used them as dumps, excavated within the SNAs or caused fires and damaged geothermal flora. If industrial land is to be zoned by these areas a buffer zone should be afforded or vested for access for essential ecological work, businesses audited for incursion onto SNAs and business owners educated on the ecological significance/ importance and their responsibilities as neighbours to such sites.

The damage caused by the above activities in SNAs with geothermal features are in direct conflict with the objectives designed to protect them.

1. Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will have more than minor effects on the ecological values and processes important to those areas.

Another strange Industrial Zone suggestion is on Poihipi Rd, it doesn't seem appropriate, given the premise to consolidate zones. It is out on a limb in a rural area. It would be easier to make an assessment as to its suitability for industrial zoning if land tenure and proposed use (if known) were made public when calling for submissions.

Include reason(s) for your submission point

The District Plan acknowledges anthropomorphic climate change and that it will have an effect on the people living in the district and the environment itself. Theories that we need population growth for greater wellbeing are questionable and closer to the principle of a pyramid scheme. Financial wellbeing, often of a minority, is but one aspect of a healthy populace.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: 46.3

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

3b RURAL ENVIRONMENT

Rural Lifestyle.

Encourage harvesting of rain water from roofs to reduce water take from bores and council supply.

Council should be careful allowing subdivision to smaller lots adjacent to Reserves or PCAs. These can impact negatively by dumping garden waste creating weed problems, domestic pets killing native fauna, cutting down or poisoning of existing trees within reserves that landowners consider to impede views.

New developments adjacent to PCAs should require buffer areas to be retired or vested to the reserve for access for essential environmental and other work.

4b.5.7 Subdivision – Outstanding Landscape Areas

i. Any subdivision of land in the General Rural Environment or Rural Lifestyle Environment that is located within an Outstanding Landscape Area where the resulting lots are less than 10 hectares, is a non-complying activity.

Comment - there should be no exceptions to this rule. Outstanding Landscape Areas are important to maintain character.

If landowners genuinely want to improve environmental outcomes the ultimate would be revegetation with native forest species.

4b.5.3 Subdivision – Rural Lifestyle Environment that does not adjoin the General Rural Environment

- i. Subdivision resulting in lots that are 2 hectares or larger that do not adjoin the General Rural Environment is a controlled activity.
- ii. Subdivision resulting in lots that are smaller than 2 hectares that do not adjoin the General Rural Environment is a non-complying activity.

In the planning map Rural Lifestyle 919 in the case of 3/864 Tukairangi Road the adjoining properties seem to be included in the Rural Lifestyle area ie. coloured orange when they should not be included in this area. There will be an expectation from these landowners that they can subdivide.

Reverse sensitivity and cumulative and precedent effect could be of concern.

Include reason(s) for your submission point

The District Plan acknowledges anthropomorphic climate change and that it will have an effect on the people living in the district and the environment itself.

Provision: Plan Change 40 - Taupō Town Centre Environment

Points: 46.4

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

The inclusion of stricter adherence to green building principles (construction) in any future building development in the towncentre. Reductions in concrete and steel use (unless certified as produced via 'green' processes), with a greater emphasis on new timber technology. This area should be showcasing the use of renewably grown construction timber.

More emphasis on buildings that are greener in terms of their life span. As mentioned elsewhere in this submission, reduced reliance on electrical means to perform functions where human mechanical means would suffice, eg opening windows.

Mandatory waste sorting and collection on an as needs basis (for free) with penalties for shops, restaurants etc that don't sort and reduce waste combined with incentives for those that do.

The careful consideration of maintaining a visible ring of green beyond the town boundary from certain, if not many (including some quite low lying) vantage points in the town. ie Mt Tauhara, the Punatekahi Ridge (Acacia Bay direction) when considering new commercial building height allowances, residential and industrial zones. Being able to see a green (pasture or forested) landscape in the distance gives the town a smaller sense of scale and contributes to mental and social wellbeing for residents.

Towncentre Increased Building Heights

There should be no increase in building heights . Increasing building heights will impact negatively on the character of Taupo.

However because this will probably go ahead regardless , mitigation should be planting of tall trees to reduce the scale and harshness of taller buildings.

Other requirements in line with strategic objectives to reduce GHG emissions etc for allowing taller buildings would be a requirement in design and construction to use a majority timber products. As Scion Building Rotorua.

Extract NZ Farm Forestry Assn

Clearwater Quays was constructed as part of mid-Rise Wood Construction in Christchurch. It appears that using wood in place of concrete to build this five storey building is removing over a million kg of CO2 from the environment.

The timber construction saved 87 400kg of CO2 compared with CO2 release of over 950 000 kg if it had been built of concrete and just under 800 000 kg released if built of steel and concrete.

The cost of design was also lower than for a building of either just concrete or steel and concrete.

Many other benefits NZ timber, lighter, earthquake resilient.

Include reason(s) for your submission point

Acceptance in the plan that councils should consider the impact of their decision making in reducing the drivers of anthropomorphic climate change.

Provision: Plan Change 43 - Taupō Industrial Zone > 4h Taupō Industrial Environment and Centennial Industrial Environment

Points: 46.5

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Comment; Industrial Land Supply / Natural Environment Values

The Industrial Zones identified on Broadlands Rd ,adjacent to Broadlands Geothermal Reserve an SNA vested to Iwi is inappropriate without some protection offered .

In the past industrial businesses/properties bordering significant geothermal sites have used them as dumps, excavated within the SNAs or caused fires and damaged geothermal flora. If industrial land is to be zoned by these areas a buffer zone should be afforded or vested for access for essential ecological work, businesses audited for incursion onto SNAs and business owners educated on the ecological significance/ importance and their responsibilities as neighbours to such sites.

The damage caused by the above activities in SNAs with geothermal features are in direct conflict with the objectives designed to protect them.

1. Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will have more than minor effects on the ecological values and processes important to those areas.

Another strange Industrial Zone suggestion is on Poihipi Rd, it doesn't seem appropriate, given the premise to consolidate zones. It is out on a limb in a rural area. It would be easier to make an assessment as to its suitability for industrial zoning if land tenure and proposed use (if known) were made public when calling for submissions.

Include reason(s) for your submission point

Provision: Plan Change 39 - Building Coverage - Residential Environment

Points: 46.6

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Include reason(s) for your submission point

Provision: Plan Change 38 - Strategic Directions

Points: 46.7

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Include reason(s) for your submission point

Provision: Plan Change 38 - Strategic Directions

Points: 46.8

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Include reason(s) for your submission point

Attached Documents

File
Note on Tukairangi Trust submission

Taupō District Council
Planning Team

Submitters: Peter, Megan and Chris Marshall on behalf of Tukairangi Trust

Kia ora Taupō District Council

Apologies if some of the content in the attached submission is duplicated or not quite under the correct heading but found the system a little difficult to operate. I am confident you can use your common sense and planning expertise to apply our submission points to the correct sections.

Ngā mihi

Chris Marshall
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I could

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Gain an advantage in trade competition through this submission

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directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Plan Change 43 - Taupō Industrial Zone > 4h Taupō Industrial Environment and Centennial Industrial Environment

Points: 47.1

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

We would like Council to amend the Industrial zoning to include in this plan change provision for Industrial zoned land in Mangakino for future business growth to support Mangakino and surrounding areas.

Include reason(s) for your submission point

We would like Council to amend the Industrial zoning to include in this plan change provision for Industrial zoned land in Mangakino for future business growth to support Mangakino and surrounding areas.

There is a lack of provision for Industrially zoned land in Mangakino. We note that the scope of the Industrial Plan Change and the S32 assessment does not include assessment of industrial needs of Mangakino and the surrounding area. The lack of any industrial zone in Mangakino significantly limits the possibilities for any industrial operator/activity to operate in Mangakino. To operate in the Residential zone requires a resource consent, and there are very limited small rural zoned holdings available for activities, furthermore they are limited by building coverage restrictions. This community does have aspiring business operators and existing business operators who wish to operate their industrial activity from Mangakino or currently operate on their residential property however are limited therefore in their expansion. So, the provision of an industrial zone in Mangakino would minimise effects of small-scale industrial activities occurring within the Residential area, and simultaneously it would provide extra capacity for the demand on Industrial land within the Taupō District. Industrial uses in such a zone are likely to service Mangakino and the surrounding rural community, reducing vehicle miles (helping to achieve Government's Climate Change Target) and providing additional local employment.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: 47.2

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Support

Include reason(s) for your submission point

This submission to the draft Plan Changes is made by Wairarapa Moana ki Pouakani Incorporation. Wairarapa Moana ki Pouakani Incorporation (Wairarapa Moana) is the owner of large land holdings of some 10,705 hectares both in, and surrounding Mangakino (refer to Appendix 1 below). Wairarapa Moana operates large dairy and forestry enterprises on the land.

Under the Plan Change 42 to the Rural Environment all Wairarapa Moana Inc large landholdings in Mangakino are shown as part of the General Rural Zone. The historical rural zoning is a result of the philosophy of the plan when established in early 2000s. The zoning for this site was subsequently not revised in the rural and residential plan changes of 2008/09 which strategically zoned land around Taupō Town. Wairarapa Moana submits that the General Rural is not appropriate on all the land adjoining the Residential zone within Mangakino. Some land adjoining the Residential zone should be considered as an appropriate part of the Residential Zone and some land as suitable for light industrial use such as tradesman's depots and workshops. It is understood that the matter of residential zoning will be addressed in the upcoming Residential Plan Change to the District Plan.

This submission covers the matters of the new General Rural zone and potential impact on WMI farming operations, and the need for Industrial zoned land in Mangakino

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment

Points: 47.2

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Support

Include reason(s) for your submission point

Overall WMI supports the focus on General Rural being managed and retained as a primary productive resource.

As such WMI supports the focus in the General Rural is on ensuring that the primary productive use is not to be impacted by subdivision that fragments viable farming blocks, nor by non-rural industry/uses nor by proximity of small lifestyle holdings. The exception to this, is rural land adjoining Mangakino township which was previously in housing, where the conversion to housing may in fact benefit Waikato River water quality and address social-economic challenges in the township. The possible concern of the interface between such a future residential use and existing rural operations is appropriate to be addressed in a Residential Plan Change assessment and a future subdivision consent.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.1 Enable Primary Production **Points: 47.3**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Include reason(s) for your submission point

Overall WMI supports the focus on General Rural being managed and retained as a primary productive resource which WMI supports.

As such WMI supports the focus in the General Rural is on ensuring that the primary productive use is not to be impacted by subdivision that fragments viable farming blocks, nor by non-rural industry/uses nor by proximity of small lifestyle holdings. The exception to this, is rural land adjoining Mangakino township which was previously in housing, where the conversion to housing may in fact benefit Waikato River water quality and address social-economic challenges in the township. The possible concern of the interface between such a future residential use and existing rural operations is appropriate to be addressed in a Residential Plan Change assessment and a future subdivision consent.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.4 Other activities **Points: 47.4**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Include reason(s) for your submission point

WMI strongly supports the retention of maori cultural activities, tourism and visitor accommodation activities, electricity generation as being appropriate in the General Rural Environment. As a maori owned farming trust, WMI supports the ongoing provision for maori to provide for their people's future through the use of their whenua.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.7 Papakāinga **Points: 47.5**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

WMI strongly supports the provisions within the General Rural which provide more easily for papakainga. As a maori owned farming trust, WMI supports the ongoing provision for maori to provide for their people's future through the use of their whenua to live collectively through papakainga.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.8 Tāngata Whenua **Points: 47.6**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

WMI strongly supports the provisions within the General Rural that provide for the exercising of Kaitiakitanga and Tikanga over ancestral land and the wider rohe. As a maori owned farming trust, WMI supports the ongoing provision for maori to provide for their people's future through the use of their whenua, and the the recognition of Kaitiakitanga in decisionmaking.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.12 Minor residential unit **Points: 47.7**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

WMI support this new provision for minor dwellings adjoining primary dwellings. Minor dwellings provide for a greater diversity of housing within rural properties for farm workers, older whanau or rangatahi to live with support of others.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies >

3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.15
Allotment size

Points: 47.8

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

WMI support the retention of larger rural blocks to support the viability of rural productivity in the district

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.16
Papakāinga

Points: 47.9

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

WMI strongly supports the provisions within the General Rural which provide more easily for papakainga. As a maori owned farming trust, WMI supports the ongoing provision for maori to provide for their people's future through the use of their whenua to live collectively through papakainga.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.17
Maori Cultural Activities

Points: 47.10

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

WMI strongly supports the retention of maori cultural activities, tourism as being appropriate in the General Rural Environment. As a maori owned farming trust, WMI supports the ongoing provision for maori to provide for their people's future through the use of their whenua.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.3 Temporary Activities

Points: 47.11

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

WMI supports the Greater flexibility provided for in the provision for temporary activities through the change from 3 days/year to 4 days/6 months.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.6 Papakāinga **Points: 47.12**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Support

Include reason(s) for your submission point

WMI strongly supports the provisions within the General Rural which provide more easily for papakainga including the exceptions and exemptions in Rules 4b.2.1, 4b.2.4 & 4b.2.8. As a maori owned farming trust, WMI supports the ongoing provision for maori to provide for their people's future through the use of their whenua to live collectively through papakainga.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.5 Commercial and industrial activities, and home businesses, **Points: 47.13**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Oppose

Include reason(s) for your submission point

It appears that to protect the Rural Environment from non rural uses, non rural industry and commercial activities (including retail) are now proposed to be restricted to a 100m² (indoor or outdoor). WMI submit that retail activities restriction be lifted to 300m² indoor and outdoor. These small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. There is little evidence provided by Council that this level of activity in fact is an effect needing to be managed in Taupo District's Rural Environment. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs. Additionally it is unclear if a Rural Industry wish to sell product from the farm gate, is this a commercial activity subject to these restrictions?.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.1 Vehicle movements **Points: 47.14**

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Oppose

Delete this rule Or limit to heavy vehicles only, not all vehicle movements

Include reason(s) for your submission point

To address perceived impacts from traffic on rural roads, this new rule is proposed of 200evm/day. There is little evidence provided in the plan change s32 assessment which illustrates the impact of heavy vehicles on rural roads. The rule itself covers all vehicle movements not just heavy vehicle movements however the policy (Policy 3b.2.11) mentions only heavy vehicles.

At a permitted level, this is an unnecessary and bureaucratic restriction on operations, and requires assessment at a PIM on each building consent for rural industries. Many businesses do not track their vehicle movements to any degree and therefore the assessments may be flawed. Where operations are large as triggered by large buildings, consideration of this matter can be addressed in a resource consent as they currently are. Hence the policy may be appropriate however the rule is administratively heavy and bureaucratic. WMI submit that this rule be removed.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.11 Heavy vehicle movements

Points: 47.15

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Retain the policy, delete the rule

Include reason(s) for your submission point

- To address perceived impacts from traffic on rural roads, this new rule is proposed of 200evm/day. There is little evidence provided in the plan change s32 assessment which illustrates the impact of heavy vehicles on rural roads. The rule itself covers all vehicle movements not just heavy vehicle movements however the policy (Policy 3b.2.11) mentions only heavy vehicles.

At a permitted level, this is an unnecessary and bureaucratic restriction on operations, and requires assessment at a PIM on each building consent for rural industries. Many businesses do not track their vehicle movements to any degree and therefore the assessments may be flawed. Where operations are large as triggered by large buildings, consideration of this matter can be addressed in a resource consent as they currently are. Hence the policy may be appropriate however the rule is administratively heavy and bureaucratic. WMI submit that this rule be removed.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.2 Maximum building coverage

Points: 47.16

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

retain proposed rule

Include reason(s) for your submission point

WMI support the increase in Building coverage from 2.5% and 1000m² to 10% and 5000m², being of benefit for Rural Industry and Horticulture

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.3 Maximum building size

Points: 47.17

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Retain proposed rule

Include reason(s) for your submission point

WMI support the increase in Building coverage from 2.5% and 1000m² to 10% and 5000m², being of benefit for Rural Industry and Horticulture

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.4 Maximum density of primary residential units

Points: 47.18

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Retain proposed rule

Include reason(s) for your submission point

WMI support this measure of density without the nominal allotments and without Rural Effects Area Radius rule

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.6 Minimum building setbacks

Points: 47.19

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend proposed rule 4b.2.6 with

(i) 30 metre setback for dwellings and minor residential units and other buildings from the front boundary.

(ii) 15 metres setback for dwellings, and minor residential units and other buildings from all other boundaries.

Include reason(s) for your submission point

The setback rule for other buildings to the front and other boundaries is not clear

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.6 Minimum building

setbacks

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Oppose

Either

a.delete the rule or

b. provide an exemption for buildings of 200m² in the definition , and provide an exemption such buildings located along side existing buildings or

c. reduce the distance to 30m from all other boundaries, or

d. (i) reduce the distance to 30m from all other boundaries adjoining General Rural and

(ii) 50m from boundaries adjoining Rural Lifestyle

Include reason(s) for your submission point

WMI oppose Rule 4b.2.6(iv) building for management of farmed animals to be setback 200m.

This rule will capture kennels, calf sheds, milking sheds, stables. As well as the larger buildings, this rule will capture too many smaller buildings (such as dog kennels for 4+ dogs), stables for 1+ horses. It will also impacts on the ability to provide new buildings alongside existing infrastructure unnecessarily. This rule will increase the cost of providing farm buildings such as milking sheds and calf sheds due to increased distances for roading and power, 200m is a significant distance from the road to reticulate power and provide roading. WMI agree this can be an issue adjoining an urban setting and perhaps may be appropriate in the Rural Lifestyle zone however is unnecessary in General Rural and will increase paperwork unnecessarily. Little evidence has been provided in the S32 to illustrate that the location of such buildings which are common place with the General Rural area is a difficulty.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.7 Minor residential units

Points: 47.21

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Include reason(s) for your submission point

WMI support this new provision for minor dwellings adjoining primary dwellings. Minor dwellings provide for a greater diversity of housing within rural properties for farm workers, older whanau or rangatahi to live with support of others.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.8 Commercial and industrial activities, and home businesses

Points: 47.22

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amendment sought is either to delete this rule or increase the area to 300m². Additionally Rural Industry should be exempt from limitation for retail.

Include reason(s) for your submission point

It appears that to protect the Rural Environment from non rural uses, non rural industry and commercial activities (including retail) are now proposed to be restricted to a 100m² (indoor or outdoor). WMI submit that retail activities restriction be lifted to 300m² indoor and outdoor. These small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. There is little evidence provided by Council that this level of activity in fact is an effect needing to be managed in Taupo District's Rural Environment. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs. Additionally it is unclear if a Rural Industry wish to sell product from the farm gate, is this a commercial activity subject to these restrictions?.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules **Points: 47.23**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Include reason(s) for your submission point

Overall WMI support the retention of large farming blocks to the benefit of ongoing and successful Rural productivity in the District.

However under the Plan Change 42 to the Rural Environment all Wairarapa Moana Inc large landholdings in Mangakino are shown as part of the General Rural Zone. The historical rural zoning is a result of the philosophy of the plan when established in early 2000s. The zoning for this site was subsequently not revised in the rural and residential plan changes of 2008/09 which strategically zoned land around Taupō Town. Wairarapa Moana submits that the General Rural is not appropriate on all the land adjoining the Residential zone within Mangakino. Some land adjoining the Residential zone should be considered as an appropriate part of the Residential Zone and some land as suitable for light industrial use such as tradesman's depots and workshops. It is understood that the matter of residential zoning will be addressed in the upcoming Residential Plan Change to the District Plan.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Amendments to the Definitions of the Taupō District Plan Section 10 **Points: 47.24**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Either

a. delete the rule and associated definition or

b. provide an exemption for buildings of 200m² in the definition ie except buildings less than 200m² , and provide an exemption such buildings located along side existing buildings ie except those buildings as defined

located adjoining existing farm buildings of similar use or

c. reduce the distance to 30m from all other boundaries

Include reason(s) for your submission point

WMI oppose Rule 4b.2.6(iv) and the associated definition of building for management of farmed animals.

This rule will capture kennels, calf sheds, milking sheds, stables. As well as the larger buildings, this rule will capture too many smaller buildings (such as dog kennels for 4+ dogs), stables for 1+ horses. It will also impacts on the ability to provide new buildings alongside existing infrastructure unnecessarily. This rule will increase the cost of providing farm buildings such as milking sheds and calf sheds due to increased distances for roading and power, 200m is a significant distance from the road to reticulate power and provide roading. WMI agree this can be an issue adjoining an urban setting and perhaps may be appropriate in the Rural Lifestyle zone however is unnecessary in General Rural and will increase paperwork unnecessarily. Little evidence has been provided in the S32 to illustrate that the location of such buildings which are common place with the General Rural area is a difficulty.

Attached Documents

File
WMI Submission Points_PC42_221208

Plan Changes 42 & 43 – New Rural Chapter and Industrial zoning of Taupō District Plan - Submission Points

Background

This submission to the draft Plan Changes is made by Wairarapa Moana ki Pouakani Incorporation. Wairarapa Moana ki Pouakani Incorporation (Wairarapa Moana) is the owner of large land holdings of some 10,705 hectares both in, and surrounding Mangakino (refer to Appendix 1 below). Wairarapa Moana operates large dairy and forestry enterprises on the land.

Under the Plan Change 42 to the Rural Environment all Wairarapa Moana Inc large landholdings in Mangakino are shown as part of the General Rural Zone. The historical rural zoning is a result of the philosophy of the plan when established in early 2000s. The zoning for this site was subsequently not revised in the rural and residential plan changes of 2008/09 which strategically zoned land around Taupō Town. Wairarapa Moana submits that the General Rural is not appropriate on all the land adjoining the Residential zone within Mangakino. Some land adjoining the Residential zone should be considered as an appropriate part of the Residential Zone and some land as suitable for light industrial use such as tradesman's depots and workshops. It is understood that the matter of residential zoning will be addressed in the upcoming Residential Plan Change to the District Plan.

This submission covers the matters of the new General Rural zone and potential impact on WMI farming operations, and the need for Industrial zoned land in Mangakino

Positive Changes to be supported

- Overall a focus on General Rural being managed and retained as a primary productive resource which WMI supports.
- As such WMI supports the focus in the General Rural is on ensuring that the primary productive use is not to be impacted by subdivision that fragments viable farming blocks, nor by non-rural industry/uses nor by proximity of small lifestyle holdings. The exception to this, is rural land adjoining Mangakino township which was previously in housing, where the conversion to housing may in fact benefit Waikato River water quality and address social-economic challenges in the township. The possible concern of the interface between such a future residential use and existing rural operations is appropriate to be addressed in a Residential Plan Change assessment and a future subdivision consent.
- The retention of maori cultural activities, tourism and visitor accommodation activities, electricity generation as being appropriate in the General Rural Environment.
- Papakainga Rules are relaxed making it easier to achieve papakainga without consent.
- New provision for minor dwellings adjoining primary dwellings.
- Greater provision for temporary activities from 3 days/year to 4 days/6 months.
- Removal of nominal allotments of 10ha
- Removal of Rural Effects Area Radius of 50m setback
- Building coverage increased from 2.5% and 1000m² to 10% and 5000m², being of benefit for Rural Industry and Horticulture
- Relaxed setbacks for dwellings from 50m to 15m
- Subdivision now at 10ha or larger

We recommend supporting these provisions in a submission.

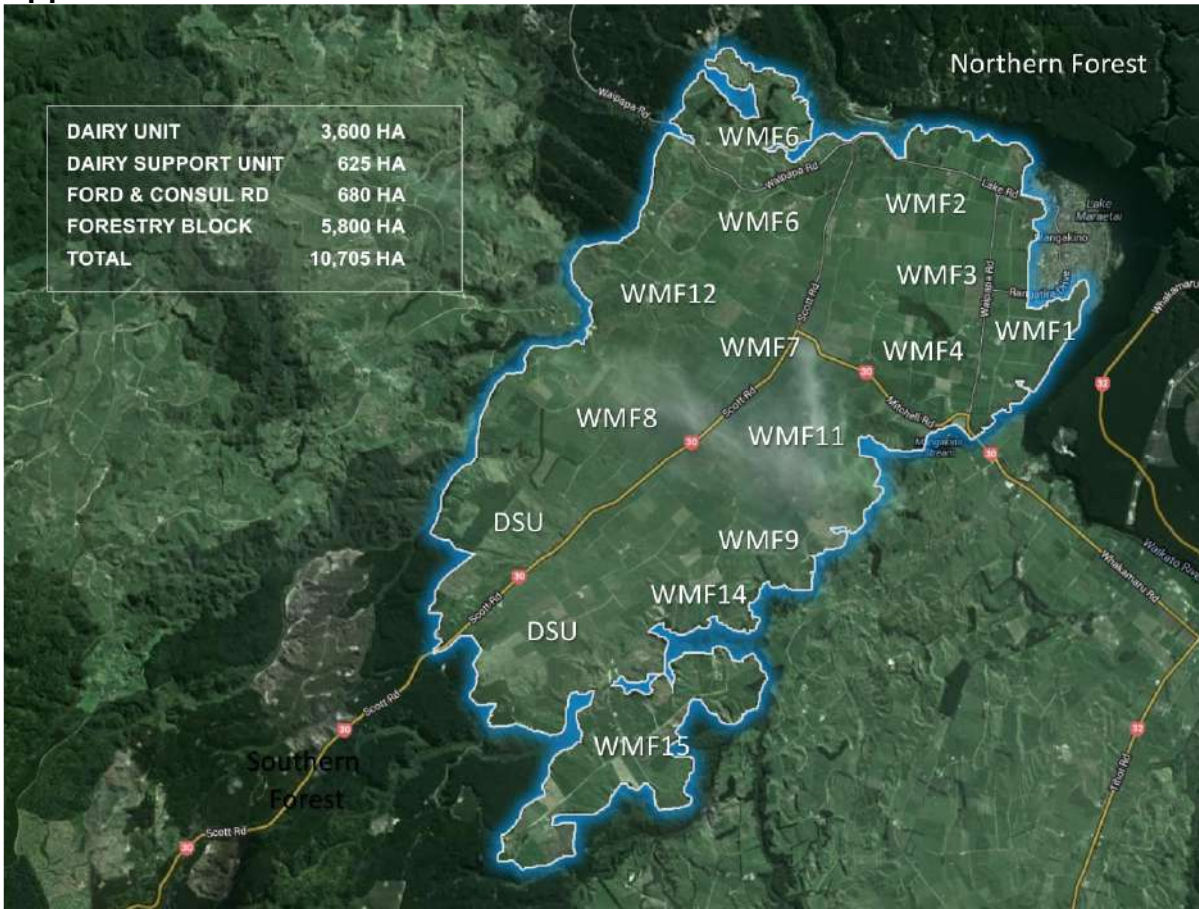
Negative Changes to be opposed

- To address perceived impacts from traffic on rural roads, a new vehicle movements rule is proposed of 200evm/day. There is little evidence provided in the plan change s32 assessment which illustrates the impact of heavy vehicles on rural roads. At a permitted level, this is a potential and unnecessary bureaucracy and restriction on operations. Where operations are large as triggered by large buildings, consideration of this matter can be addressed in a resource consent. Hence the policy may be appropriate however the rule is administratively heavy and bureaucratic. WMI submit that this rule be removed.
- To protect the Rural Environment from non rural uses, non rural industry and commercial activities (including retail) are now proposed to be restricted to a 100m² (indoor or outdoor). This change will therefore require consent for any retail activity over 100m² from WMI land. WMI submit that retail activities restriction be lifted to 300m². These small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community.
- New setback Rules on building for management of farmed animals (200m), will capture kennels, calf sheds, milking sheds, stables. This captures too many smaller buildings, and impacts on the ability to provide new buildings alongside existing infrastructure unnecessarily. This rule will increase the cost of providing farm buildings due to increased distances for roading and power. WMI agree this can be an issue adjoining an urban setting and perhaps may be appropriate in the Rural Lifestyle zone however is unnecessary in General Rural and will increase paperwork unnecessarily.
- Lack of provision for Industrially zoned land in Mangakino. We note that the scope of the Industrial Plan Change and the S32 assessment does not include assessment of industrial needs of Mangakino and the surrounding area. The lack of any industrial zone in Mangakino significantly limits the possibilities for any industrial operator/activity to operate in Mangakino. To operate in the Residential zone requires a resource consent, and there are very limited small rural zoned holdings available for activities, furthermore they are limited by building coverage restrictions. This community does have aspiring business operators who wish to operate from Mangakino or currently operate on their residential property however are limited therefore in their expansion. So, the provision of an industrial zone would minimise effects of small-scale industrial activities occurring within the Residential area, and simultaneously it would provide extra capacity for the demand on Industrial land within the Taupō District. Industrial uses in such a zone are likely to service Mangakino and the surrounding rural community, reducing vehicle miles (helping to achieve Government's Climate Change Target) and providing local employment.

We wish to be heard in support of this submission.

Catrina Eagles
Cheal Consultants
8 December 2022

Appendix 1



Wairarapa Moana ki Pouakani Incorporation Lands with Mangakino Township top right



First name: Rick

Last name: Keehan

On behalf of:

Enterprise Great Lake Taupo trading as Amplify

Postal address: 32 Roberts Street

Suburb:

City: Taupo

Country: New Zealand

Postcode: 3330

Email: rick@taupo.biz

Daytime Phone: 0211321475

I could

I could not

Gain an advantage in trade competition through this submission

I am

I am not

directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
Submission Table - Amplify District Plan Submission 9 December 2022



Submission Table

- We recommend using this submission table to state your submission points. This will assist Council to accurately record your submission points and ensure your submission is valid.

- Each individual submission point should be on a different row. Use as many rows as you require.

- You can attach additional commentary and documents should you need to.

- The examples in italics below are for guidance only to show how submission points could be set out and do not represent a position of Council.

- This form is for use for the following Plan Changes:
 - Plan Change 38 – Strategic Directions

 - Plan Change 39 – Residential Building Coverage

 - Plan Change 40 – Taupō Town Centre Environment

 - Plan Change 41- Removal of Fault lines

 - Plan Change 42 – General Rural and Rural Lifestyle Environments

 - Plan Change 43 – Taupō Industrial Environment Rezoning

Plan Change State which Plan Change that your submission relates (see above)	Specific part/provision State the specific part or provision of the proposed Plan Change your submission relates to. If you cannot give a specific number Council Planners will add this for you.	Support? Oppose? Amend? choose one of the above	Relief sought What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?	Reasons Include reason(s) for your submission point
PC 39 – Residential Building Coverage	4a.1.1 Maximum Building Coverage	Support	Retain	Support the increase to the permitted residential building coverage in most residential environments from 30% and 35%.
PC 40 – Taupo Town Centre Environment	4g.1.9 Performance Standards	Support	Retain	Support the proposal to increase the maximum height permitted in the Taupo district to 12-18 meters in some parts of the town centre.
PC 40 – Taupo Town Centre Environment	4g.1.12 & 6 Verandas	Support	Retain	Support the clarification that 'service lanes' are not subject to requirements for veranda provisioning but the pedestrian frontages and pedestrian laneways system are subject to the veranda requirements.

PC 40 – Taupo Town Centre Environment	4g.2.2 Land Use Rules	Support	Retain	Support the increase in temporary activity rule to help support the development and operation of events and functions which bring economic benefits to the Taupo district.
PC 42 – General Rural and Rural Lifestyle Environments		Support	Retain	<p>Amplify supports the proposal to split the Taupo District Rural Environment into two sections. We believe the General Rural Environment, allowing for additional development for another large property and minor dwelling provides provision for development needs but also maintains large spaces for productive land.</p> <p>The Rural Lifestyle Environment provision delivers on an increased demand for rural lifestyle blocks around the district while provisioning for the effective use of infrastructure.</p>
PC 43 – Taupo Industrial Environment Rezoning		Support	Retain	Amplify supports the changes. We agree that there is a demand and need for additional industrial land within the Taupo District. It is important for the economic growth and development of the region that a suitable supply of appropriate land is available and support the plan to rezone land to either Taupo or Centennial Industrial Environment. We would encourage more industrial land to be made available than just the proposed areas for assessment. This would assist to provide simplicity for development in the future.



First name: Alana

Last name: Delich

On behalf of:

Waikato

Postal address: 72 Hinemoa Avenue, Taupō 3330

Suburb:

City: Taupo

Country: New Zealand

Postcode: 3330

Email: alana.delich@gmail.com

Daytime Phone: 0276738851

I could

I could not

Gain an advantage in trade competition through this submission

I am

I am not

directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

I am prepared to consider a joint submission with others making a similar submission.

Attached Documents

File

Alana Delich_Plan Change 43 Submission letter 7Dec22



RE: Submission on Plan Change 43 to the Taupō District Plan

I am writing this submission to encourage caution towards proposed Plan Change 43 – Taupō Industrial Land. In particular the re-zoning of the Broadlands Road West Area. The Broadlands Road West site is adjacent to the Broadlands Road geothermal area and includes potential areas of un-mapped geothermal habitat (outlined in pink in the included map), which have not been adequately assessed for the ecological value.

Industrial development has been allowed to occur adjacent to geothermal areas in the Taupō District in the past, without adequate assessment, delineation, and ecological protection of these areas. Although these are not a pristine geothermal ecosystems, they represent a unique habitat type that cannot be artificially created, and development of these areas contributes to the on-going decline of these critically endangered ecosystems.

Geothermal Ecosystems

In New Zealand, areas of geothermal vegetation are classified as naturally uncommon ecosystems, as they were rare prior to human colonisation. Of the five geothermal ecosystem types that have been identified, three are found within Broadlands Road geothermal area. These are Heated Ground, Fumaroles and Hydrothermally altered ground – now cool. All three of these rare geothermal ecosystems have been described as a critically endangered (Holdaway et al. 2012, Wiser et al. 2013).

Geothermal ecosystems require the correct surrounding geological conditions to exist. They cannot be created like a native forest or a wetland. That is why it is particularly important to protect the geothermal ecosystems we have left.

Geothermal areas often have plant assemblages that differ from the surrounding cooler areas. And due to the rarity of these ecosystems, that plants within them are also often rare. Geothermal kānuka (*Kunzea tenuicaulis*) is the predominant geothermal vegetation at Broadlands Road geothermal area and is a Threatened – Nationally Endangered species (De Lange et al. 2017).

Potential Effects of Development

Geothermal systems are naturally dynamic, and steam vents and areas of hot ground tend to “wander” or move spatially over time (Willoughby and Beard 2015). Therefore, it is important to retain an appropriate buffer of undeveloped land around any geothermal features to allow for this future wandering. In addition, Willoughby and Beard identify urban and industrial development as the adjacent land-use that has the greatest impact on the ecological integrity of geothermal ecosystems.

Although the evidence is anecdotal, another potential effect of development on the periphery of geothermal areas is the increase in impermeable surfaces potentially reducing the potential for rainwater recharge of shallow heated groundwater. Research has shown the Otumuheke Springs are fed by shallow groundwater, and that changes in rainfall may contribute to changes in the flow-rate of the springs (Bromley and Glover 1996). Therefore, the wider impacts on geothermally influenced shallow groundwater due to the ongoing increases in industrial development within the geothermal



areas of Taupō needs to be considered. Hydrological assessments should be undertaken as part of any consent applications for industrial development.

Review of PC43 Attachments

The S32 does review “Natural Values” within SNA108, and I note that “site 4” is set back 100m from SNA 108. However, the geothermal values have not been adequately taken into account. The 100m setback from SNA108 does not include the potential geothermal vents in the centre of the site (outlined in pink in the attached Figure 1 map).

I note that this area has been highlighted in Attachment D as “possible geothermal vents”. Cheal did find hot ground present towards the centre of the site. Any heated geothermal soils, or hydrothermally altered ground – now cool is a critically endangered ecosystem. From the photograph within the Cheal report there are small remnants of geothermal kānuka (*Kunzea tenuicaulis*) present which is a Threatened – Nationally Endangered species (De Lange et al. 2017).

The S32 does not review the Geothermal Module of the Waikato Regional Plan in the context of the Broadlands Road West site, and Significant Geothermal Features are not mapped. (Most recent map, as per Wildlands 2021 included in Figure 1).

Waikato Regional Plan – Module 7 -Geothermal Module

There are relevant rules in the Geothermal Module to the proposed plan change 43 at Broadlands Road West. In particular section 7.6.6 – Surface Activities Affecting Significant Geothermal Features. The geothermal module of the regional plan does not seem to have been reviewed as part of this plan change.

The Broadlands Road geothermal area is within the Wairakei-Tauhara geothermal system, this is classified as a development system under module 7 of the Waikato Regional Plan, as the geothermal field has been developed for the production of geothermal energy. In Development systems, all Significant Geothermal Features (SGF’s) are identified. SGF’s are as mapped in Section 7.10 of the Regional Plan. However, Implementation Methods for Policy 7, point 2. states that “Waikato Regional Council will introduce a variation to correct/update the maps in Section 7.10 of this plan for Significant Geothermal features as a consequence of new information obtained since notification”. The maps in Section 7.10 were updated by Variation No. 7 – Minor Variations and Geothermal Maps which became operative in December 2010, so another update would be timely.

The Glossary definition of Significant Geothermal Features includes “Geothermal habitat on heated ground or cooled acid ground: Any area of terrestrial habitat of thermotolerant indigenous species on current or formerly geothermally heated ground”. Therefore, an ecological assessment to map the full distribution of geothermal ecosystems, and geothermal kānuka at Broadlands Road Geothermal Area should be conducted as part of the information gathering to inform this plan change.

In Section 7.6.6. vegetation clearance and soil disturbance are only permitted within 20m of significant geothermal features if they are for the protection of the geothermal features (Rule 7.6.6.2). Therefore, any earthworks for development would not be permitted within 20m of an SGF without resource consent.

Mitigation

As the landholders will benefit financially from any plan change which re-zones this land to industrial land, it is prudent to think about the potential for future developers to contribute to ecological mitigation at this site.

There are opportunities to improve the existing geothermal ecosystem from the current baseline, which would also increase the resilience of this ecosystem to any potential environmental effects.

Potential mitigation is best achieved by buffering geothermal ecosystems with indigenous dominant vegetation. This increases the resilience of these ecosystems to change (e.g. in the instance of 'wandering' geothermal activity). A buffer should be at least 20m to comply with Rule 7.6.6.2 of the WRP, but a buffer of 50m would be more ecologically appropriate.

Mitigation to create an indigenous dominant buffer and increase the resilience of a geothermal ecosystem include fencing to exclude vehicles and industrial encroachment, weed control, planting of native buffer vegetation, and animal pest control.

Any mitigation needs to be enduring. Weed control must be followed up to ensure missed weeds are treated, and newly germinating weeds are managed. Native buffer planting will require release weeding to allow good establishment. Animal pest control will also require an enduring commitment to maintain healthy ecosystems.

Conclusion

The Broadlands Road West Site has not had adequate ecological assessment completed as part of this proposed plan change.

Potential hot vents towards the centre of the site (likely geothermal heated ground, or hydrothermally altered ground now cool – both critically endangered ecosystems) have not been included in the 100m setback from SNA108. These areas must be assessed by a qualified ecologist, and if found to be geothermal ecosystems, must be excluded from the plan change with an appropriate buffer (minimum 20m).

Any development of this site must come with conditions of contributing to the restoration of the adjoining geothermal systems, in order to halt the on-going decline of these critically endangered ecosystems.

Suggested Plan Change 43 text

If "Broadlands West" is to be re-zoned, I suggest that the following bulleted additions to the text in plan change 43, 4h.3.7 would address the concerns of this submission:

"...shall also include, but not be limited to:

- Ecological assessment of potential geothermal features,
- Ecological mitigation plan
- Hydrological assessment of effects of development on groundwater recharge."

Thank you for the opportunity to submit on Plan Change 43.

Ngā mihi

Alana Delich



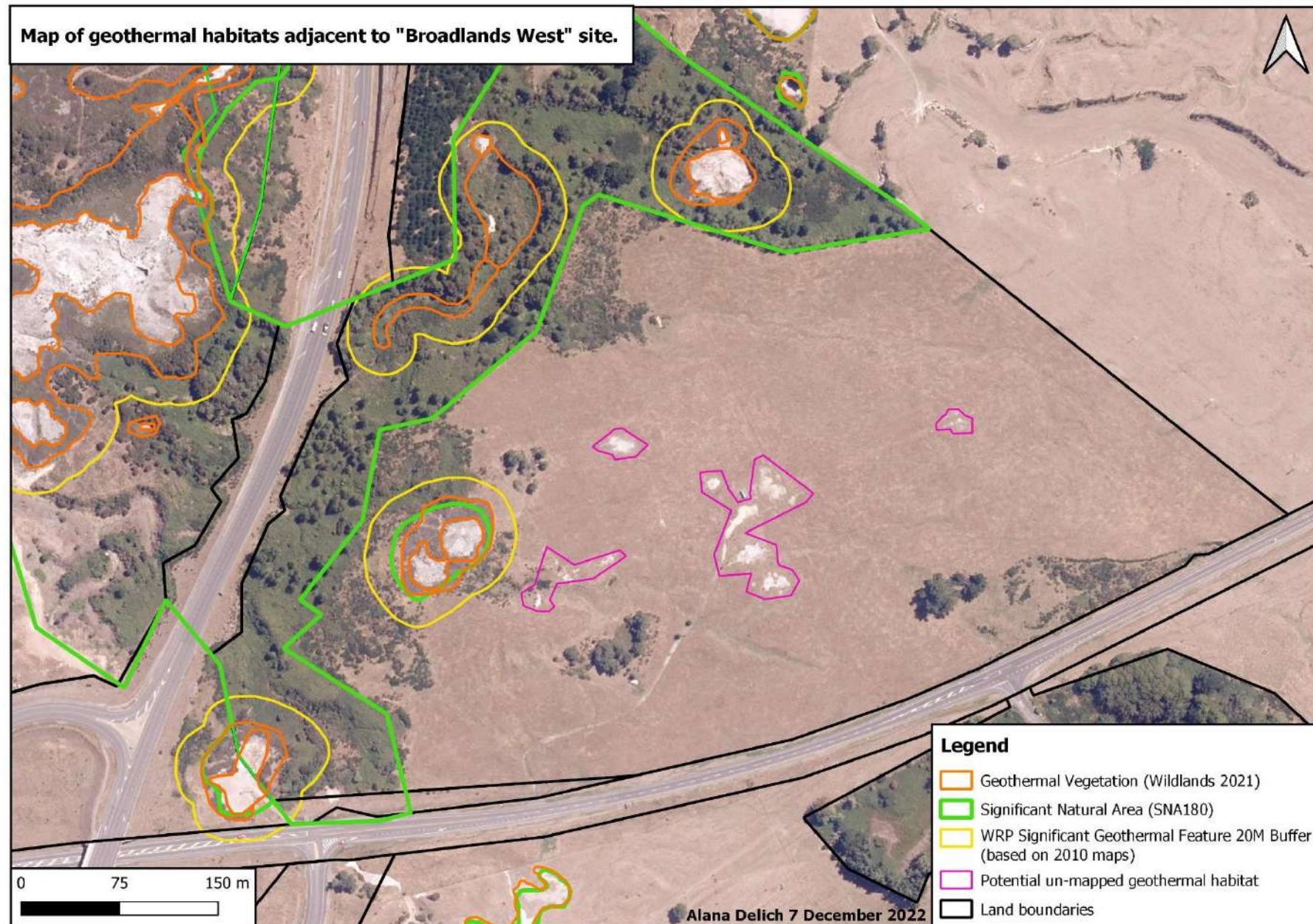
Senior Ecologist, Singers Ecological

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Figure 1: Map of geothermal vegetation, and potential un-mapped geothermal habitat adjacent to the "Broadlands West" site, proposed for re-zoning as Taupō Industrial Environment by Plan Change 43.





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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
TDC

Submission on Proposed Change 43 to the Taupo District Plan

Pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

To: Taupō District Council, districtplan@taupo.govt.nz

Submitter: Advanced Properties Group Limited (APGL). APGL is a commercial and residential land development and consultancy company operating throughout the North Island (including Taupo), with an on-going interest in the regulatory environment for land development.

APGL confirms that it could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that this submission relates to are: The proposed rezoning of land at 189 Napier Road (Lot 2 DP 499406), "the land", from "Rural Environment" to "Taupo Industrial Environment".

The Reasons for the Submission are:

- The land proposed to be zoned for industrial purposes adjoins residentially zoned land. Residential and industrial land uses are considered to be inherently incompatible. For example, the Taupo Industrial zone permits a range of industrial/trade activities and site development including 12m high buildings and structures over 75% of a property, and as close as 5m from residential boundaries.
- The land is not available to meet the need for additional industrial land in Taupo, as use of the land is managed through a comprehensive East Urban Lands (EUL) Land Use Consent (RM080142) and associated masterplan. An overview of the consent is at Appendix 1.
- A Consent Notice registered on the title of the land secures the outcomes of that Land Use Consent, and states:

"Direct Access onto Napier Road is not permitted.

Development including further subdivision, building and any change of use is required to demonstrate compliance with the approved East Urban Lands landuse consent Masterplan reference 080142 granted on 9 June 2009 for the area described as "The Campus"

- The Campus Precinct is the northern gateway for the EUL, the consent for which provides for business park, education, accommodation, and residential activities. Section 5.9 of the EUL masterplan explains that:

The Campus is the northern gateway of the EUL, and more importantly, one of the primary gateways into Taupo town. It also sits at a pivotal position on the "Green-Loop" provided by the Main Road, to connect into the CBD via Crown Road, and back along the waterfront. This location makes it ideally situated to become an economic driver for the wider Taupo district and another attraction for the town.

Education, research and incubator opportunities, based around Taupo's primary industries (energy, forestry & farming) have long been identified as a viable foundation for a new economic driver for Taupo. The Campus has the location that this opportunity needs to become a reality.

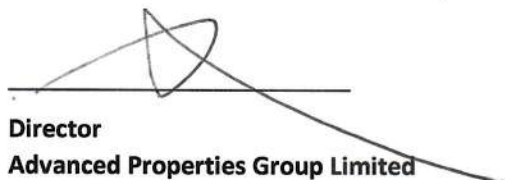
A campus is more than just the education and research, it is also about links to industry and lifestyle. Providing commercial space to like minded business and organisations will strengthen the Campus. It will require living opportunities within the Campus and visitor accommodation, complementing the facilities being developed at the Falls Hotel".

The existing Clean Energy Centre (located on the land) is consistent with the Land Use Consent. For the northern gateway to instead be an industrial development (permitted by the Taupo Industrial Environment rules and standards) would be inconsistent with the Land Use Consent, and potentially result in adverse character and amenity effects in the immediate locality (compared to such effects arising from exercise of the Land Use Consent).

- If land uses (other than those provided for in the Land Use Consent) are suitable and have resource management merit, the owner of the land can reasonably expect that a variation to the consent notice condition pursuant to s221 of the Resource Management Act 1991 would be obtained for such land uses, as has been the case for southern stages of the EUL as explained in Appendix 1. That is the appropriate resource management process. It is considered that rezoning the land "Taupo Industrial" is premature, unnecessary, and contrary to the Land Use Consent and Consent Notice.
- Although the s32 report supporting the Plan Change considers site constraints, the report does not refer to the Land Use Consent or the Consent Notice, nor does it assess the effects of the proposed rezoning on the land use outcomes intended through the EUL consent (including the range of residential, accommodation, educational, and commercial activities provided for in The Campus Precinct).

The Relief Sought: For the reasons set out above, the relief sought is that the re-zoning be disallowed.

Hearing: APGL wishes to be heard in support of its submission and, if others make a similar submission, APGL will consider presenting a joint case with them at the hearing.


 Director
 Advanced Properties Group Limited

8-12-22
 Date

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APPENDIX 1
EUL LAND USE CONSENT – OVERVIEW

Land use consent RM080142 was granted by Taupo District Council on the 8th June 2009 for “*Staged development of the land for 2200 residential units and 18,510m² gross floor area of commercial space. The land is zoned Residential (un-serviced) and the overall development will exceed District Plan provisions in respect to maximum vehicle movements, and in some locations development controls in respect of maximum building height, maximum height to boundary, maximum building coverage, maximum plot ratio, maximum total coverage, and minimum building setbacks*”.

1.3 Masterplan



2009 Masterplan for Taupo East Urban Lands

The consent is for a 20-year non-lapse duration and provides for development in accordance with a “Taupo East Urban Lands Masterplan” (see above).

The development is divided into seven “precincts” linked by a main road extending from Lake Terrace in the southwest, to Napier Road in the northeast. Development within each of these precincts is detailed in the masterplan document in terms of building design, access, linkages, and open space. The proposal is primarily focused on a range of residential housing forms and density and also includes two commercial hubs (including the primary commercial core in the southwestern Village Precinct and a more education focused commercial area in the northeast Campus Precinct).

Below is an enlarged excerpt of the northern part of the masterplan. The land proposed to be zoned Taupo Industrial is at the top right-hand (northeast) corner of the snip, with Napier Road to the north and State Highway One alongside the eastern boundary. The elevated land to the south and southwest is owned by Taupo District Council. It is zoned and planned, through the EUL consent, for residential development.



Northern excerpt of the EUL Masterplan

All of the land covered by the EUL Land Use Consent has a Consent Notice registered on the land titles, requiring that development be undertaken in accordance with the Land Use Consent and masterplan.

The southern stages of the EUL consent are currently being developed, including construction of part of Tauhara Ridge Drive (the spine road from Lake Terrace in the south to Napier Road in the north). Development has also included the Kokomea Park commercial area where a Countdown supermarket has recently opened. Residential subdivision and house construction is also underway, along with the first stage of a retirement village.

The developers of these EUL stages obtained variation to the Land Use Consent (pursuant to s127 of the Resource Management Act 1991) to authorise changes to the masterplan aligning with current market drivers, and to reflect best practice urban design approach. The next EUL stage to the northeast (including the oval reserve in the image above) was similarly assessed and a varied consent granted in mid 2022.



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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
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Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Plan Change 39 - Building Coverage - Residential Environment

Points: 79.1

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain

Include reason(s) for your submission point

We support this change to building coverage as it brings TDC in line with other similar sized Councils and provides for additional housing within our Residential Environment.

We do note that page 5 of the S32 references no change in Permeable surfaces relating to stormwater as a result of no change in the Total coverage rule. We only note in brief that the Total Coverage rule as it is worded does not in fact manage the amount of impermeability on each site. If this is what is intended this matter requires addressing in a future Residential Plan Change.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.10 Taupō Town Centre Environment Height Overlay **Points: 79.2**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Combine Rules 4g.1.9 and 4g.1.10 as follows

g.1.9 Maximum Building Height

The maximum height of any building shall be as follows:

- i. Total Maximum height of three (3) floors above ground level, except where provided by (ii) below:
- ii. The maximum height of any building shall be in accordance with the Taupō Town Centre Environment Height Overlays in the planning maps.

4g.1.10 Taupō Town Centre Environment

Environment

Height Overlay

- ~~i. Any building, or part of any building, located within the Taupō Town Centre Environment Height Overlays in the planning maps that exceeds a total height of (3) floors above ground level.~~
- iii. Any application arising from this rule shall not be limited or publicly notified

Include reason(s) for your submission point

Part i of this rule doesn't say anything. In conjunction with Rule 4g.1.9 is this saying that the height limit is now 3 storeys up to 16m. Why does it matter how many storeys if there is a 16m or 12m height limit.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.12 Verandas **Points: 79.3**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Support

Include reason(s) for your submission point

Removing rules for verandahs on service lanes makes sense.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.16 Verandas **Points: 79.4**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Support

Include reason(s) for your submission point

Removing rules for verandahs on service lanes makes sense.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.2 Land Use Rules **Points: 79.5**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Support

Consider the linkage to noise, odour and loading/parking for the extended period now proposed.

Include reason(s) for your submission point

This change provides more flexibility for temporary activities, although this does provide for a temporary activity to exceed any performance standard (including noise and odour, loading and access) for a period of 2.5 weeks.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.4 Assessment Criteria **Points: 79.6**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

Amend

NOTE: These matters are applicable to a breach of Rule ~~4g.1.10~~ 4g.1.9

Include reason(s) for your submission point

The assessment criteria are suitable. in light of submission point on Rules 4g.1.9 & 4g.1.10 a slight amendment is proposed

Provision: Plan Change 41 - Removal of Fault lines > Plan Change Provisions **Points: 79.7**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

Include reason(s) for your submission point

No fault line rules in the District Plan means that if owners are building a building which doesn't need resource consent, the identification of fault lines and setbacks is potentially only identified at PIM stage or via the Waikato hazard portal. This could be quite late in the process for this matter to be identified. If not in the District Plan, Council must be diligent in providing this information in LIMs and in PIMs, and on enquiry.

We do question if the new fault lines in the district plan or not? Mapi has them listed as a layer but not in the district plan layers. Similarly we note that the Flood hazard layer sits outside of the District Plan layers in Mapi however they are noted in Section 4e as being in the District Plan. Clarity is needed on how these hazard layers are addressed/labeled on Mapi with regard to District Plan maps.

Provision: Plan Change 43 - Taupō Industrial Zone > 4h Taupō Industrial Environment and Centennial Industrial Environment

Points: 79.8

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Ensure that the future interface of Map 2 industrial zone with Residential zone, and the amenity of the Eastern gateway to Taupo is considered at the time of subdivision in particular if a controlled activity subdivision is proposed.

Identifying the land as Sensitive with specific assessment criteria could address this. Or the addition of assessment criteria in 4h.4.12.

Include reason(s) for your submission point

The provision of additional industrially zoned land is excellent to support industrial growth. Map 2 provides for an area of Industrial land in close proximity to Residential zoned land. Neither the subdivisions rules or the assessment criteria address this. There are provisions relating to avoiding non-industrial activities within the Industrial Zone and existing policy 3t.2.6 requires consideration of this matter. Careful consideration is required to ensure that this policy is sufficient for this location and is reflected in a controlled activity subdivision.

Additionally we note that this location is on a main gateway to the town. Again policy 3t.2.3 addresses this however the key rules addressing this matter are the setback rule 4h.1.3 and 4h.1.4 to be implemented at the time of building construction. There is no linkage to this matter in subdivision, in particular a controlled activity subdivision.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Planning Maps **Points: 79.9**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Clarification of the area in Kinloch shown as proposed Rural Lifestyle as it relates to Rule 4a.4.4 and proposed minor dwelling rule is required

Include reason(s) for your submission point

An area in Kinloch Structure plan is included as rural lifestyle. Currently a 2nd dwelling requires consent, yet rural lifestyle allows minor dwelling. this appears to be a contradiction in rules.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Amendments to the Definitions of the Taupō District Plan Section 10

Points: 79.10

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Buildings for the management of farmed animals - includes, but is not limited to, buildings used for accommodating livestock or farmed animals, either overnight or for a period during the day, and includes cow milking sheds, calf sheds, buildings used to house intensive farming activities, poultry farming buildings, feed pads, animal boarding facilities and stables. Buildings housing animals do not include a residential unit accommodating household pets such as cats and dogs and do not include buildings less than 100m².

Include reason(s) for your submission point

For Buildings for the Management of Farm Animals, an exemption for small buildings could be provided to provide for small scale buildings.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Amendments to the Definitions of the Taupō District Plan Section 10

Points: 79.11

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Rural Industry - an activity that directly supports, services, or is dependent on primary production and has a locational-functional or operational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, dairy farming and geothermal/electricity generation, rural contractors, equestrian activities, horticulture, home kill, forestry processors, lawfully established industry, and the sale of rural produce on the site of production.

Include reason(s) for your submission point

Rural Industry definition should also include rural contractors, equestrian, horticulture, home kill, forestry processors, except lawfully established industry, and the sale of rural produce on the site of production (to avoid confusion with the Commercial Activity rule).

Expanding the definition of Rural Industry for greater clarity in particular regarding the retailing of primary produce at the location of production will further enable Rural Industry to function within the General Rural zone.

We also note that 'Locational Need' is not defined, not in the District Plan and not in law. Functional need or

Operational Need is defined in law and in National Planning Standards. We query what locational need is and suggest that functional or operational need would be better.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies

Points: 79.12

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Seek amendment

Amend to link policies to specific objectives, similar structure to current plan. Include broader assessment criteria for each rule.

Include reason(s) for your submission point

We seek a change in formatting of the O&Ps, a clear linkage policies to specific objectives provides greater clarity in policy framework which is the policy structure in the rest of the District Plan. Additionally we note the removal of assessment criteria. We value Assessment criteria not as a limit to the issues to be considered but a finer direction of the issues. Where Restricted Discretionary activities are proposed, Assessment criteria are of course most necessary.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.3 Rural industry

Points: 79.13

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Amend

Rural industry is enabled whilst general commercial and industrial activities not having a locational functional or operational need to be within the General Rural Environment, other than home-business, are avoided.

Delete rules that limit vehicle movements for rural industry, delete rules that restrict indoor primary production and delete rules that restrict commercial activities and alter or delete rules that restrict sale of primary produce.

Include reason(s) for your submission point

expanding the definition of Rural Industry for greater clarity in particular regarding the retailing of primary produce at the location of production will further enable Rural Industry to function within the General Rural zone. We note that 'Locational Need' is not defined, not in the District Plan and not in law. Functional need or Operational Need is defined in law and in National Planning Standards. We query what locational need is and suggest that functional or operational need would be better.

We do question how rural industry is enabled through the inclusion of rules that restrict indoor primary production and restrict commercial activities and restrict sale of primary produce.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.4 Other activities

Points: 79.14

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Delete Rule 4b.2.8

Include reason(s) for your submission point

We support this policy however question how is visitor accommodation and tourism activities enabled by the proposed rule restricting commercial activity?

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.6 Impacts on infrastructure **Points: 79.15**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

The impacts on road infrastructure arising from subdivision and development are managed through the consent process.

Include reason(s) for your submission point

what does are managed mean? How are the impacts to be managed? And managed by who? Addressed by an applicant or Council via rates and Development contributions? and what about managing the permitted activity impacts? Greater clarity is needed in this objective. We also note that only a policy relating to vehicle movements is proposed but not other infrastructure so is it in fact roading infrastructure that is the key issue?

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.7 Papakāinga **Points: 79.16**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Support

Include reason(s) for your submission point

Greater provision for papakainga to provide whanau the ability to live on their whenua is supported.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.9 Maintaining the established character **Points: 79.17**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Maintain the established General Rural Environment character, as defined by:

1. Large open spaces between built structures
2. A mix of residential and rural industry buildings
3. Noises related to production activities during the day but low levels of noise at night
4. Low levels of light spill.
5. Infrequent variable (weekly and seasonally) vehicle movements to and from a site
6. Limited signage that directly relates to the activity operating on the site.

Include reason(s) for your submission point

We note, as does the District Plan that the Rural environment is one with significant industry and activity within it. In locations there is not infrequent vehicle movements, in some locations there are high site specific vehicle movements such as glasshouses, quarries, milk factories etc. And where roads are upgraded sufficiently this is appropriate. We consider that maintaining the established rural character does not mean restricting vehicle movement and economic development for rural industry. We note that arterial routes have

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.11 Heavy vehicle movements

Points: 79.18

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend through the addition of assessment criteria for this rule

Include reason(s) for your submission point

To address perceived impacts from traffic on rural roads, this new policy and associated rule is proposed of 200evm/day. There is little evidence provided in the plan change s32 assessment which illustrates the impact of heavy vehicles on rural roads. The rule itself covers all vehicle movements not just heavy vehicle movements however the policy (Policy 3b.2.11) mentions only heavy vehicles.

At a permitted level, this is an unnecessary and bureaucratic restriction on operations, and requires assessment at a PIM on each building consent for rural industries. Many businesses do not track their vehicle movements to any degree and therefore the assessments may be flawed. Where operations are large as triggered by large buildings (thus requiring consent), consideration of this matter can be addressed in a resource consent as they currently are.

Greater clarity on where mitigation is to occur is also needed.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.1 Vehicle movements

Points: 79.19

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Oppose

Delete

or

Amend infringement of this rule to a Restricted Discretionary Activity to be clear what the key issue is and what mitigation is expected.

Include reason(s) for your submission point

To address perceived impacts from traffic on rural roads, this new rule and associated policy is proposed of 200evm/day. There is little evidence provided in the plan change s32 assessment which illustrates the impact of

heavy vehicles on rural roads. The rule itself covers all vehicle movements not just heavy vehicle movements however the policy (Policy 3b.2.11) mentions only heavy vehicles.

At a permitted level and when considering the policy framework of enabling Rural Industry, this is an unnecessary and bureaucratic restriction on operations, and requires assessment at a PIM on each building consent for rural industries. Many businesses do not track their vehicle movements to any degree and therefore the assessments may be flawed. Where operations are large as triggered by large buildings (thus requiring consent), consideration of this matter can be addressed in a resource consent as they currently are.

Greater clarity on where mitigation is to occur is also needed. If there is a concern regarding the roading network, where are the key concerns and how are these to be addressed in consent applications? Consideration of access crossing and visibility at those access crossings do not appear to be the main concern on damage to the transport network broadly.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.12
Minor residential unit **Points: 79.20**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

This enables additional housing for the elderly or rangatahi or young families with less restriction that currently

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.7 Minor residential units **Points: 79.21**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend

Is this rule A maximum of one minor residential unit per primary residential unit per allotment? Or

A maximum of one minor residential unit per primary residential unit permitted by Rule 4b.2.4 ~~per allotment~~..

Include reason(s) for your submission point

This enables additional housing for the elderly or rangatahi or young families with less restriction that currently.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.14
Commercial and industrial activity **Points: 79.22**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Oppose

delete

Include reason(s) for your submission point

Be clear whether Rural Industry can undertake commercial activities ie sale of produce at the farm gate?

However we have seen little evidence to outline how much of a problem commercial activity in rural zone is? The policy and associated rule creates bureaucracy and problems with defining each activity. We note that these small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.17 Papakāinga

Points: 79.23

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

provides for additional housing for Maori

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.17 Maori Cultural Activities

Points: 79.24

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

We support the continuation of maori cultural activities as being provided for the General Rural environment.

Clarification is required for Clause ii relates to all land management and uses.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment

Points: 79.25

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend

~~The character of the Rural Lifestyle Environment is maintained and protected from incremental subdivision and development.~~

The development of the Rural Lifestyle Environment shall provide for low intensity rural activities and rural amenity associated with low intensity farming

Include reason(s) for your submission point

Given the level of change to occur through the new areas of Rural Lifestyle zone, the character of this area can't be maintained when rules allow significant subdivision... how will the proposed subdivision occur? The development of the Rural Lifestyle Environment shall provide for low intensity rural activities and rural amenity

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.2
Avoid reverse sensitivity **Points: 79.26**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Amend

~~Adverse reverse sensitivity effects, including conflict with permitted and legally established activities in neighbouring Environments, are avoided.~~

The Development of the Rural Lifestyle Environment shall avoid Adverse reverse sensitivity effects, including conflict with permitted and legally established activities in neighbouring Environments

Include reason(s) for your submission point

We consider it important that the policy frameworks reflects the changing nature of this new zone.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.3
Commercial and industrial activities **Points: 79.27**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Include reason(s) for your submission point

Clarity is needed here for Rural industry associated commercial activities

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.5
Allotment sizes **Points: 79.28**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

Amend

That allotments are ~~developed~~ maintained at sizes to:

1. Enable small scale primary production to occur; and
2. Avoid the cumulative impacts on community infrastructure and services arising from an increase in demand or increases to level of service.

Include reason(s) for your submission point

This objective needs to reflect the changing nature of this zone. This Objective currently reflects a future state not the change that will occur through the new Rural Lifestyle subdivision provisions

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.6 Impacts on community infrastructure **Points: 79.29**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

The impacts on community infrastructure arising from subdivision and development are managed through subdivision consents conditions and development contributions.

Include reason(s) for your submission point

Are managed how?

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Policy 3b.3.9 Character of the Rural Lifestyle Environment **Points: 79.30**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

Manage the anticipated character of the Rural Lifestyle Environment as defined by:

1. Buildings on different sites are separated from each other in a way that creates a sense of privacy.
2. Accessory buildings that do not dominate the landscape.
3. Dwellings may be large but are surrounded by open space and do not dominate the landscape.
4. A general absence of urban infrastructure including community stormwater and wastewater services.
5. An environment which includes residential activities, rural productive activities and home business activities.
6. Noise related to production activities during the day but low levels of noise at night.
7. Low levels of light spill.
8. Limited signage that directly relates to the activity operating on the site.
9. The provision of minor units associated with primary dwellings

Include reason(s) for your submission point

This policy should also reflect the provision of minor units

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Policy 3b.3.14 Māori Cultural Activities

Points: 79.31

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Include reason(s) for your submission point

Clarity is needed with regard to Clause ii as to its the application of it to all land management and all land uses.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.5 Commercial and industrial activities, and home businesses,

Points: 79.32

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Oppose

delete

OR

Make Rule 4b.1.5 and 4b.3.3 consistent in their assessment criteria.

Include reason(s) for your submission point

Be clear whether Rural Industry can undertake commercial activities ie sale of produce at the farm gate?

However we have seen little evidence to outline how much of a problem commercial activity in rural zone is? The policy and associated rule creates bureaucracy and problems with defining each activity. We note that these small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs.

If the rule is to remain we note that the assessment criteria are different bwtm Gen Rural and Rural Lifestyle for commercial activities.

This rule also covers commercial and industrial and home business however Rule 4b.2.2 covers commercial homes business and retail.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.3 General Rules - Rural Lifestyle Environment > 4b.3.3 Home business, commercial,

and retail activities

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Delete or

amend

4b.3.3 Home business, commercial, and ~~retail~~ industrial activities

1. A home business, commercial and retail activity which complies with performance standards is a permitted activity.
2. A home business, commercial and retail activity which does not comply with performance standards is a restricted discretionary activity.

When considering activities under Rule 4b.3.3 Council restricts the exercise of its discretion to the following matters:

1. The effect of the activity on the Rural Lifestyle Environment character, having regard to visual effects and lighting effects.
2. The effects of the activity's vehicle movements, parking, loading and access on the network.
3. Any nuisance effects such as odour, noise and glare are managed within the site.
4. The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated.
5. The hours of operation for the activity.
6. The proposed signage associated with the activity.

Include reason(s) for your submission point

We submit that there is little evidence provided that this is a significant effect on the rural zone and that the rule is not necessary.

These small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs. Additionally it is unclear if a Rural Industry wish to sell product from the farm gate, is this a commercial activity subject to these restrictions?.

Further more we do question how visitor accommodation and tourism activities are enabled by this rule restricting commercial activity?

We note that the assessment criteria are different bwtm Gen Rural and Rural Lifestyle for commercial activities.

Also Rule 4b.1.5 covers commercial and industrial and home business however this rule covers commercial homes business and retail. Is industrial not included? Is retail not a subset of commercial?

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.10 Intensive indoor primary

production and rural industry

Points: 79.34

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

amend

4b.1.10 Intensive indoor primary production and rural industry

1. An intensive indoor primary production or rural industry activity which complies with performance standards 4b.2.1, 4b.2.2, 4b.2.3 and 4b.2.5 and 4b.2.6 is a permitted activity.
2. An intensive indoor primary production or rural industry activity which does not comply with these performance standards is a restricted discretionary activity.

The Council restricts the exercise of its discretion to the following matters:

1. The daily vehicle movements expected to and from the allotment.
2. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.
3. The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated.
4. The hours of operation for the activity.
5. The proposed signage associated with the activity.

~~The Council restricts the exercise of its discretion to the following matters:~~

- ~~1. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.~~
- ~~2. The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated.~~
- ~~3. The hours of operation for the activity.~~
- ~~4. The proposed signage associated with the activity.~~

Include reason(s) for your submission point

We suggest that complies with 4b.2.6 is also provided for else infringement of this rule for Rural Industry will fall to discretionary. Also the assessment criteria is repeated.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.2 Maximum building coverage

Points: 79.35

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Include reason(s) for your submission point

greater provision for rural industry

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.3 Maximum building size

Points: 79.36

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

greater provision for rural industry

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.5 Maximum building height

Points: 79.37

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

greater flexibility for rural industry

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.6 Minimum building setbacks

Points: 79.38

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend proposed rule 4b.2.6 with

- (i) 30 metre setback for dwellings and minor residential units and other buildings from the front boundary.
- (ii) 15 metres setback for dwellings, and minor residential units and other buildings from all other boundaries.

And

Amend to include

4b.1.11 Building setback

Infringement of Rule 4b.2.6 is a restricted discretionary activity

-

Include reason(s) for your submission point

The setback rule for other buildings to the front and other boundaries is not clear. Additionally the infringement of this rule on its own should be restricted discretionary.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.6 Minimum building setbacks

Points: 79.39

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Either

a.delete the rule

or

b. provide an exemption for buildings of 100m² in the definition , and provide an exemption such buildings located along side existing buildings

or

c. reduce the distance to 30m from all other boundaries,

or

d. (i) reduce the distance to 30m from all other boundaries adjoining General Rural and
(ii) 50m from boundaries adjoining Rural Lifestyle

Include reason(s) for your submission point

The Rule 4b.2.6(iv) building for management of farmed animals to be setback 200m is unnecessarily restrictive.

This rule will capture kennels, calf sheds, milking sheds, stables. As well as the larger buildings, this rule will capture too many smaller buildings (such as dog kennels for 4+ dogs), stables for 1+ horses. It will also impacts on the ability to provide new buildings alongside existing infrastructure unnecessarily. This rule will increase the cost of providing farm buildings such as milking sheds and calf sheds due to increased distances for roading and power, 200m is a significant distance from the road to reticulate power and provide roading. We agree this can be an issue adjoining an urban setting and perhaps may be appropriate in the Rural Lifestyle zone however is unnecessary in General Rural and will increase paperwork unnecessarily. Little evidence has been provided in the S32 to illustrate that the location of such buildings which are common place with the General Rural area is a difficulty.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.7 Minor residential units

Points: 79.40

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Seek amendment

4b.2.7Minor residential units

A maximum of one minor residential unit per primary residential unit per allotment.

1. All minor residential or accommodation activity units shall:

1. Be no larger than 100m² in size (inclusive of garaging).
2. Be located no greater than 20 metres from the primary residential unit.
3. Share an accessway/driveway with the primary residential unit.

Include reason(s) for your submission point

Rule 4b.2.7 and Rule 4b.4.5 should be consistent

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.2 Minor residential units

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Points: 79.41

Seek amendment

Include reason(s) for your submission point

Assessment criteria should be consistent between Rule 4b.1.2 and Rule 4b.3.2.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.3 General Rules - Rural Lifestyle Environment > 4b.3.2 Minor residential units

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Points: 79.42

Seek amendment

When considering activities under Rule 4b.3.2 Council restricts the exercise of its discretion to the following matters:

1. The extent to which the residential unit and vehicle access point design, siting and external appearance adversely affects rural character and amenity.
2. Site topography and orientation and whether the residential unit(s) and vehicle access point can be more appropriately located to minimise adverse visual amenity effects.
3. Effect on nearby sites, including outlook and privacy.
4. Whether the residential unit and the vehicle access point can be more appropriately located to maintain, enhance or restore indigenous biodiversity values.
5. The ability to mitigate adverse effects through the use of screening, planting, landscaping and alternative design.
6. The proximity between the primary residential unit and the minor residential unit.
7. Proposed methods for the avoidance, remedying or mitigation of potential adverse effects, and the degree to which they would be successful
8. The likelihood of future subdivision which results in the minor residential unit being on a separate allotment to the primary residential unit.

Include reason(s) for your submission point

Assessment criteria should be consistent between Rule 4b.1.2 and Rule 4b.3.2.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.8 Commercial and industrial activities, and home businesses **Points: 79.43**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amendment sought is either to delete this rule or increase the area. Additionally Rural Industry should be exempt from limitation for retail.

Include reason(s) for your submission point

We submit that there is little evidence provided that this is a significant effect on the rural zone and that the rule is not necessary.

These small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs. Additionally it is unclear if a Rural Industry wish to sell product from the farm gate, is this a commercial activity subject to these restrictions?.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment **Points: 79.44**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Include reason(s) for your submission point

We seek greater inclusion in the district plan of the exclusion of limited notification on appropriate rules in particular that most Restricted discretionary activities are precluded from limited notification given the limited scope of effects, thus increasing certainty on limited notification for applicants on such rules

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.3 General Rules - Rural Lifestyle Environment > 4b.3.7 High voltage transmission lines

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

amend

4b.3.7 High voltage transmission lines

1. Any building (except network utilities) located within 0 - 12m of a high-voltage transmission line is a restricted discretionary activity.

When considering activities under Rule 4b.1.7 Council restricts the exercise of its discretion to the following matters:

1. The location of the structure in relation to high-voltage transmission line.
2. Any effects on the safe and efficient functioning of the transmission line.

~~The Council restricts the exercise of its discretion to the following matters:~~

- ~~1. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.~~
- ~~2. The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated.~~
- ~~3. The hours of operation for the activity.~~
- ~~4. The proposed signage associated with the activity.~~

Include reason(s) for your submission point

remove the second set of assessment criteria as being unrelated

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.1 Vehicle movements

Points: 79.46

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Delete? Amend?

Oppose

same relief sought as noted against Rule 4b.2.1

Include reason(s) for your submission point

we oppose for the same reasons as noted against Rule 4b.2.1

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.2 Maximum building coverage

Points: 79.47

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Amend?

Support

Include reason(s) for your submission point

Greater flexibility for buildings

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.3 Maximum building size

Points: 79.48

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Include reason(s) for your submission point

Greater flexibility for buildings

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.4 Maximum density of residential units

Points: 79.49

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

we seek clarification how this relates to Areas x & y

Include reason(s) for your submission point

we seek clarification how this relates to Areas x & y

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.5 Minor residential units

Points: 79.50

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Rule 4b.2.7 and Rule 4b.4.5 should be consistent

Include reason(s) for your submission point

Rule 4b.2.7 and Rule 4b.4.5 should be consistent

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.7 Minimum building setbacks

Points: 79.51

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

amend

- (i) 30 metre setback for dwellings and minor residential units and other buildings from the front boundary.
- (ii) 15 metres setback for dwellings, and minor residential units and other buildings from all other boundaries except as restricted by clause iii.

Include reason(s) for your submission point

Clarify rules for other buildings

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.9 Home business, commercial, and retail activities

Points: 79.52

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Oppose

amendment sought is either to delete this rule or increase the area. Additionally Rural Industry should be exempt from limitation for retail.

This rule also covers commercial and industrial and home business however Rule 4b.2.2 covers commercial homes business and retail.

4b.4.9 Home business, commercial, and industry ~~retail~~ activities

1. Any indoor or outdoor space used for a home business, commercial or ~~retail~~ industry purposes, shall be less than 100m² in gross floor area for indoor activities, or 100m² of land area for outdoor activities.
2. For home businesses the principal operator of the home business must be a permanent resident on the site to which the home business relates.

Include reason(s) for your submission point

We submit that there is little evidence provided that this is a significant effect on the rural zone and that the rule is not necessary.

These small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs. Additionally it is unclear if a Rural Industry wish to sell product from the farm gate, is this a commercial activity subject to these restrictions?.

If the rule is to remain we note that the assessment criteria are different bwtwn Gen Rural and Rural Lifestyle for commercial activities.

This rule also covers commercial and industrial and home business however Rule 4b.2.2 covers commercial homes business and retail. Is retail not commercial and why is industry uses restricted in General Rural but not Rural Lifestyle?

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules

Points: 79.53

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?**Seek amendment****Include reason(s) for your submission point**

Under Rule 4b.5.2 and 4b.5.3 a 1.95ha lot inside the Rural Lifestyle zone will be a Non-complying activity however a 1.95ha lot adjoining the Rural zone would be a discretionary activity – this appears inconsistent and requires amendment.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment **Points: 79.54**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?**Seek amendment**

4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment

1. Subdivision resulting in lots that are 4 hectares or larger adjoining the General Rural Environment is a controlled activity.
2. Subdivision resulting in lots that are smaller than 4 hectares adjoining the General Rural Environment is a discretionary non-complying activity.

Include reason(s) for your submission point

Under Rule 4b.5.2 and 4b.5.3 a 1.95ha lot internal to ie inside the Rural Lifestyle zone will be a Non-complying activity however a 1.95ha lot adjoining the Rural zone would be a discretionary activity – this appears inconsistent and requires amendment.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment **Points: 79.55**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?**Seek amendment**

amend

Amend as follows**4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment**

1. Subdivision resulting in lots that are 2 hectares or larger that do not adjoin the General Rural Environment is a controlled activity.
2. Subdivision resulting in lots that are smaller than 2 hectares that do not adjoin the General Rural Environment is a non-complying discretionary activity.

For the purposes of Rules 4b.5.1.i, 4b.5.2.i and 4b.5.3.i the matters over which the Council reserves control for the purpose of assessment are:

1. The design and layout of the subdivision to ensure safe and efficient access onto existing and/or proposed roads, multi-modal connectivity if appropriate, suitable building platforms to accommodate future complying buildings, and adequate quatum management of stormwater.
2. The identification of any natural hazards or contaminated sites and how these may affect the stability of

- the land and suitability of any future building sites, including any information provided by a suitably qualified person whose investigations are supplied with the subdivision application.
3. Whether the desired environmental outcome with a consistent and appropriate standard of infrastructure is achieved such as through compliance with the Council's Development Guidelines and Structure Plans.
 4. The extent to which earthworks and vegetation removal is required to create vehicle tracks and building platforms.
 5. Any actual or potential effects on areas or features of cultural, historic, landscape or natural value as identified in the plan.
 6. The imposition of conditions in accordance with Sections 108 and 220 of the Resource Management Act 1991.
 7. Any potential adverse effects from Natural Hazards, including flood inundation or erosion from the District's waterways and Lakes, and fault lines.
 8. Any immediate adverse or potentially adverse effects, including cumulative effects, on the amenity and landscape values of the Rural Environment, and the methods by which such effects can be remedied or mitigated.

Include reason(s) for your submission point

Under Rule 4b.5.2 and 4b.5.3 a 1.95ha lot inside the Rural Lifestyle zone will be a Non-complying activity however a 1.95ha lot adjoining the Rural zone would be a discretionary activity – this appears inconsistent and requires amendment.

there is a lack of clarity regarding the inclusive of fault lines and 'adequate' management of stormwater. Is this adequate with regard to quantum mgmt or quality management? In regard to WRC guidelines yet the rural context this requires clarification.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.5 Subdivision resulting in a new public road, or extension of existing public road **Points: 79.56**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

4b.5.5 Subdivision resulting in a new public road, or extension of existing public road

1. Any subdivision or activity which results in a new public road or extension of existing public roads, water, stormwater or wastewater utility services is a restricted discretionary activity.

The Council restricts the exercise of its discretion to the following matters:

- a. The impact of the resulting development on the ability of the wastewater, stormwater and drinking water infrastructure to service the existing service area as well as the new development;
- b. The impact of the resulting development on the ability of the roading networks to safely and sustainably operate and service the new development including the need for connectivity to adjoining land and other roads and the facilitation of multimodal transport ;
- c. The effect that the development will have on the stormwater catchment.

Include reason(s) for your submission point

assessment criteria does not address the consideration of connectivity or alternative modes of transport

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.6 Subdivision - Other

Points: 79.57

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Update Rules in Rule 4b.5.6 to be more consistent with General Rural subdivision rules

Include reason(s) for your submission point

Rules in Areas X& Y are inconsistent with the Gen Rural rules.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.9 Subdivision - More than 12 allotments

Points: 79.58

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

amend to include assessment criteria or provide policy direction similarly.

4b.5.9 Subdivision - More than 12 allotments

Any subdivision of land where more than twelve (12) allotments share a single common access in the General Rural Environment or Rural Lifestyle Environment is a discretionary activity.

Assessment Criteria

1. Adequacy of road legal and formed width

2. Adequacy of legal arrangements for the private road maintenance.

3. the consideration for connectivity or future connectivity

4. the provision of multi modal considerations ie public pedestrian access or public cycleways including easements .

-

Include reason(s) for your submission point

There are no related policies for this rule. Additionally there are no assessment criteria for this rule. Some guidance is needed to confirm key matters of consideration. Granted under this rule in the current district plan, there are many rural subdivisions granted for more than 12 users on a private road where it is now known there is difficulty with the ongoing maintenance and ownership structure of these private roads. There is little/no guidance in the proposed plan regarding adequacy of formation, adequacy of legal arrangements for the private road maintenance, the consideration for connectivity or future connectivity or the provision of multi modal considerations ie public pedestrian access or cycleways. Such guidance would assist Council and Developers alike.

We also note that the Traffic and transport O&Ps provide little direction on this matter also.

Attached Documents

File

No records to display.

**Organisation:**

Department of Conservation

First name: Ashiley**Last name:** Sycamore**On behalf of:**

Penny Nelson, Director-General of Conservation

Postal address: Private Bag 3072, Waikato Mail Centre**Suburb:****City:** Hamilton**Country:** New Zealand**Postcode:** 3240**Email:** asycamore@doc.govt.nz**Daytime Phone:** 0272344847 I could I could not

Gain an advantage in trade competition through this submission

 I am I am not

directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions**Provision:** Plan Change 38 - Strategic Directions**Points: 89.1**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Refer to submission document for full submission points.

Include reason(s) for your submission point

Refer to submission document for full submission points.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: 89.2

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Refer to submission document for full submission points.

Include reason(s) for your submission point

Refer to submission document for full submission points.

Provision: Plan Change 43 - Taupō Industrial Zone

Points: 89.3

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Oppose

Refer to submission document for full submission points.

Include reason(s) for your submission point

Refer to submission document for full submission points.

Attached Documents

File
Submission by the Director-General of Conservation



DOC-7222510
DOC Reference: CP227

9 December 2022

Taupō District Council
30 Tongariro Street
Taupō 3330

Email: districtplan@taupo.govt.nz

Attn: District Plan Team

Taupō Operative District Plan – Plan Change 38, 42, & 43 – Strategic Directions, General Rural and Lifestyle Environments, & Taupō Industrial Land

Please find enclosed the submission by the Director-General of Conservation in respect of Plan Change 38, 42, & 43 of the Taupō Operative District Plan. The submission identifies the Director-General's concerns.

Please contact Ashiley Sycamore (RMA Planner) in the first instance if you wish to discuss any of the matters raised in this submission (asycamore@doc.govt.nz or 027 234 4847).

Yours sincerely

Dave Lumley
Operations Manager – Tūrangi District
Department of Conservation
Te Papa Atawhai

Form 5: Submission on notified proposal for policy statement or plan, change or variation

Pursuant to clause 6 of the First Schedule of the Resource Management Act 1991

To: Taupō District Council (**the Council**)

Name of submitter: Penny Nelson, Director-General of Conservation (the **Director-General**)

1. This is a submission on Plan Change 38 (Strategic Directions), Plan Change 42 (General Rural and Lifestyle Environments), and Plan Change 43 (Taupō Industrial Land) of the Taupō Operative District Plan.
2. I could not gain an advantage in trade competition through this submission
3. The specific provisions of the proposal that my submission relates, and the detailed decisions sought to are set out in **Attachment 1** to this submission.
4. I **seek** the following decision from the Council:
 - a. That the particular provisions of Proposed Plan Change 38, 42, & 43 that I support, as identified in Attachment 1, are retained;
 - b. That the amendments, additions and deletions to Proposed Plan Change 38, 42, & 43 sought in Attachments 1 are made; and
 - c. Further or alternative relief to like effect to that sought in 4. a. and 4. b. above.
5. The decisions sought in this submission are required to ensure that Proposed Plan Change 38, 42, & 43:
 - a. promotes the sustainable management of natural and physical resources in the Taupō District as required by Part 2 of the Resource Management Act 1991 (RMA);
 - b. provides for the preservation of the natural character of wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development as required by section 6(a) of the RMA;
 - c. provides for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as required by section 6(c) of RMA;
 - d. is otherwise consistent with Part 2 of the RMA;
 - e. has particular regard to the other matters in section 7 of the Act.

- f. Gives effect to the National Policy Statement for Freshwater Management 2020 (NPS-FM);
 - g. gives effect to the Waikato Regional Policy Statement as required by section 75(3) of the RMA.
 - h. gives effect to the Vision and Strategy for the Waikato River ('Vision and Strategy').
 - i. The changes sought are necessary, appropriate and sound resource management practice.
6. I wish to be heard in support of my submission, and if others make a similar submission, I will consider presenting a joint case with them at the hearing.

Dave Lumley

Operations Manager – Turangi District
Department of Conservation
Te Papa Atawhai

Acting pursuant to delegated authority on behalf of Penny Nelson, Director-General of Conservation
Date: 9 December 2022

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Address for service:

Attn: Ashiley Sycamore, RMA Planner
Department of Conservation
RMA Shared Services
Private Bag 3072
Hamilton 3240
New Zealand
Email: asycamore@doc.govt.nz
Phone: 027 234 4847

ATTACHMENT 1:

**PROPOSED PLAN CHANGE 38, 42, & 43 – TAUPŌ OPERATIVE DISTRICT PLAN
SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION**

The decision that has been requested may suggest new or revised wording for identified sections of Proposed Plan Change 38, 42, & 43. This wording is intended to be helpful but similar, alternative, or additional wording which will address the matters outlined in this submission may be equally acceptable. Text quoted from Proposed Plan Change 38, 42, & 43 and the Taupō Operative District Plan is shown in *Italics*. The wording of decisions sought shows proposed amendments in **bold** with new text as underlined and original text to be deleted as ~~strikethrough~~.

Unless specified in each submission point my reasons for supporting are that the policies are consistent with the purposes and principles of the Resource Management Act 1991 (RMA).

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
Proposed Plan Change 38 – Strategic Directions			
General – National Policy Statement for Indigenous Biodiversity exposure draft (NPS-IB)	Amendment requested	The NPS-IB currently has no legal effect; however, it is expected to come into effect in December 2022 prior to the further submission and hearing process of Plan Change 38. The Director-General considers it would be effective and efficient to align the review of the Plan Change 38 provisions with the policy direction and requirements anticipated under the NPS-IB, to avoid an additional plan change.	The Council should undertake a review of the NPS-IB exposure draft (or the soon to be gazetted NPS-IB document) to confirm Proposed Plan Change 38 is giving effect to this national direction. The Strategic Directions chapter should be updated to give effect to the NPS-IB where required. Any other amendments that may be necessary or appropriate to address my concerns.
General – Biodiversity offsetting and biodiversity compensation	Amendment requested	The Director-General notes that while biodiversity compensation is mentioned once in the ODP, there needs to be a more coordinated shift towards an effects management hierarchy to have better regard to section 6(c) of the RMA.	Include an objective and/or policy in relation to biodiversity offsetting and biodiversity compensation. Include definitions for biodiversity offsetting and biodiversity compensation. This could be included within the Natural Environmental Values section of the Strategic Direction chapter.

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
		<p>As a starting point, Proposed Plan Change 38 (Strategic Direction chapter) should be updated to include an objective and/or policy in relation to biodiversity offsetting and biodiversity compensation, with definitions.</p> <p>Either at this stage or in a different Plan Change or District Plan update, include clear guidance on biodiversity offsetting with regard to significant biodiversity such as wetlands and wetland fauna.</p> <p>Up to date guidance can be found here: Guidance on biodiversity offsetting in New Zealand: Policies and plans (doc.govt.nz) Additionally, as noted above, it would be effective and efficient to align the District Plan provisions with the policy direction and requirements anticipated under the National Policy Statement on Indigenous Biodiversity.</p>	<p>Provide clear guidance on biodiversity offsetting and biodiversity compensation. Up to date guidance on this topic is found here: Guidance on biodiversity offsetting in New Zealand: Policies and plans (doc.govt.nz)</p> <p>Also, see Appendix 3 in the exposure draft of the National Policy Statement on Indigenous Biodiversity which is available at the following link: NPSIB-exposure-draft.pdf (environment.govt.nz)</p> <p>Any other amendments that may be necessary or appropriate to address my concerns.</p>
2.1 Strategic Direction, 1 Tangata Whenua, Whole Chapter	Support	<p>The Director-General generally supports the tangata whenua section, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the chapter.</p> <p>The provisions are consistent with Part 2 of the RMA and wider planning documents.</p>	<p>Retain as notified, unless iwi/hapu/whanau request specific changes.</p> <p>Note: There are spelling errors in this section that should be corrected prior to Plan Change 38 becoming operative e.g. “the Te Tiriti o Waitangi” should be corrected to “Te Tiriti o Waitangi”; “mautaranga” should be corrected to “mātauranga”.</p>

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
2.2 Strategic Direction, 2 Freshwater Quality / Te Mana o te Wai, Whole Chapter	Support	<p>The Director-General generally supports the freshwater quality/Te Mana o te Wai section, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the cultural objectives and policies within this section.</p> <p>The provisions give effect to the NPS-FM and wider planning documents.</p>	Retain as notified, unless iwi/hapu/whanau request specific changes.
2.3 Strategic Direction, 3 Urban Form and Development, 2.3.2 Objectives, Objective 7	Support in part – Amendment requested	<p>The Director-General requests an amendment to Objective 7 to ensure the wording is consistent with the other Objectives within this section and to ensure the consideration of adverse effects on the environment is not limited to just subdivision stage.</p> <p>The wording of Objective 7 is otherwise supported.</p>	<p>Change the wording of Objective 7 to:</p> <p><i>7. Subdivision, use and development is designed to avoid, remedy or mitigate adverse effects on the environment and occurs in a sequenced and coherent manner that protects or enhances the important natural values of the environment where it is located.</i></p>
2.3 Strategic Direction 3 Urban Form and Development, 2.3.3 Policies, Policy 7	Support	<p>The Director-General generally supports Policy 7, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the policy.</p> <p>Papakāinga provisions enable māori to occupy their ancestral land in line with Part 2 of the RMA.</p>	Retain as notified, unless iwi/hapu/whanau request specific changes.
2.3 Strategic Direction, 3 Urban Form and Development, 2.3.3 Policies, Policy 12	Support in part –	The Director-General requests an amendment to strengthen the wording of proposed Policy 12 and	12. Do not support Avoid subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values.

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
	Amendment requested	thereby have better regard to section 6 of the RMA.	
2.4 Strategic Direction, 4 Climate Change, Whole Chapter	Support	<p>The Director-General generally supports the climate change section. New Zealand's biodiversity and natural landscapes are being affected by climate change. These changes are resulting in extreme weather, rising sea levels, and rising temperatures. This is putting pressure on our wildlife and wild places.</p> <p>Adapting to climate change and reducing our national greenhouse gas emissions will increase the natural environment's resilience to these impacts. Including a section on climate change within Proposed Plan Change 38 is considered to be consistent with Part 2 of the RMA.</p>	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 2	Support	The Director-General supports proposed Objective 2 for being consistent with section 6(c) of the RMA.	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 3	Support	The Director-General supports proposed Objective 3.	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 4	Support	The Director-General generally supports proposed Objective 4, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the objective.	Retain as notified, unless iwi/hapu/whanau request specific changes.

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 5	Support in part – Amendment requested	The Director-General requests an amendment to strengthen the wording of proposed Objective 5 and thereby have better regard to section 6(b) of the RMA.	Change the wording of Objective 5 to: <i>5. The protection of outstanding landscape areas from inappropriate subdivision, land use and development which may adversely affect their landscape attributes.</i>
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 6	Support	The Director-General generally supports proposed Objective 6, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the objective.	Retain as notified, unless iwi/hapu/whanau request specific changes.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 7	Support	The Director-General supports proposed Objective 7.	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.3 Policies, Policy 1	Support in part – Amendment requested	The Director-General requests the inclusion of ‘subdivision’ within proposed Policy 1 to allow for consideration of the adverse effects that could occur on SNAs from subdivision.	Change the wording of Policy 1 to: <i>1. Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from subdivision, land use and development activities that will have more than minor effects on the ecological values and processes important to those areas.</i>
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.3 Policies, Policy 2	Support	The Director-General supports proposed Policy 2.	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.3 Policies, Policy 3	Support	The Director-General generally supports proposed Policy 3, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the policy.	Retain as notified, unless iwi/hapu/whanau request specific changes.

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.3 Policies, Policy 4	Support	The Director-General supports proposed Policy 4.	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.3 Policies, Policy 5	Support	The Director-General generally supports proposed Policy 5, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the policy.	Retain as notified, unless iwi/hapu/whanau request specific changes.
Proposed Plan Change 42 – General Rural and Rural Lifestyle Environments			
New papakāinga provisions	Support	The Director-General generally supports the proposed papakāinga provisions, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the proposed provisions.	Retain as notified, unless iwi/hapu/whanau request specific changes.
Proposed Plan Change 43 - Taupō Industrial Land			
The rezoning of identified Site 4 from Rural Environment to Industrial Land: 63 Broadlands Road and 261 Broadlands Road, Taupō	Oppose	<p>Identified Site 4 is proposed to be rezoned from Rural Environment to Industrial Land. There is a lack of detail in the Section 32 Evaluation Report for Plan Change 43 in relation to the potential adverse effects on SNA180 from the rezoning of Site 4 to Industrial Land.</p> <p>The Section 32 report notes that “SNA180 is to the north of the site and a modest 0.38ha within”, while another part of the s32 report states “Area 4 – Broadlands Road West is set back 100m from, and does not extend into, SNA180 which is located</p>	<p>Retain identified Site 4 at 63 Broadlands Road and 261 Broadlands Road, Taupō as Rural Environmental Zone.</p> <p>Alternatively, complete additional investigations to determine whether there are any adverse effects on SNA180 or any area that meets the criteria of a SNA or geothermal SNA from the proposed rezoning of identified Site 4 to Industrial Land. Suggested relief includes, but is not limited to:</p>

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
		<p>to the east and north of the rezoning.” It appears the location of the rezoned Industrial Land has been adjusted around the extent of SNA180, however the maps provided in the report could be clearer in this regard.</p> <p>The Director-General considers the loss of indigenous ecosystems and geothermal features, including geothermal vegetation to be a significant risk associated with the proposed rezoning. In case of industrial development adjoining SNAs or geothermal SNAs there is the risk of encroachment into these sensitive environments, which are irreplaceable.</p> <p>The National Policy Statement for Indigenous Biodiversity exposure draft includes a policy in relation to geothermal SNAs which states “Policy 11: Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.” If an area meets the criteria of a geothermal SNA, the district must work with tangata whenua to make or change its plans to include objectives, policies, and methods that, in relation to any new subdivision, use, and development that provide a level of protection of</p>	<ul style="list-style-type: none"> • A suitably qualified ecologist confirms whether identified Site 4 qualifies as an SNA or a geothermal SNA. • Complete further investigation to determine if other aspects of the NPS-IB should be explored in relation to the proposed rezoning. The NPS-IB is expected to be gazetted in December 2022. • Provide an Ecological Assessment to determine the indigenous biodiversity values of SNA180 and the impact (if any) of the proposed Industrial Land rezoning on those values through the application of the effects management hierarchy.

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
		the geothermal SNA further detailed within the NPS-IB.	

Organisation:

Federated Farmers of New Zealand – Rotorua / Taupō

First name: Colin**Last name:** Guyton**Postal address:****Suburb:****City:****Country:** New Zealand**Email:** jcookmunro@fedfarm.org.nz**Daytime Phone:** 027 331 0084

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Submission made by Colin Guyton - 027 2756546
 Address for Service - Jo-Anne Cook Munro - 027 331 0084

Attached Documents

File
PDF - District Plan Submission - Federated Farmers of New Zealand – Rotorua - Taupo

SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ



Form 5

Submission on publicly notified proposal for policy statement or plan Clause 6 of First Schedule, Resource Management Act 1991

- To: Taupō District Council
30 Tongariro Street
Taupō 3330

Private Bag 2005
Taupō 3352

Via email: districtplan@taupo.govt.nz
- Submission on: **Taupō District Plan Change 38 – Strategic Direction, Plan Change 41 – Removal of Fault Lines, Plan Change 42 – General Rural and Rural Lifestyle Environments and Plan Change 43 – Taupō Industrial Land**
- Date: 9 December 2022
- Submission by: Federated Farmers of New Zealand – Rotorua / Taupō
COLIN GUYTON
ROTORUA / TAUPŌ PROVINCIAL PRESIDENT
Federated Farmers of New Zealand
M 027 275 6546
E jcookmunro@fedfarm.org.nz
- Address for service: **JO-ANNE COOK MUNRO**
SENIOR POLICY ADVISOR / RESOURCE MANAGEMENT SOLICITOR
Federated Farmers of New Zealand
M 027 331 0084
E jcookmunro@fedfarm.org.nz
1. Federated Farmers of New Zealand – Rotorua / Taupō (Federated Farmers) could not gain an advantage in trade competition for this submission.
 2. Please refer to the attached table for the specific provisions of Plan Change 38 – Strategic Direction, Plan Change 41 – Removal of Fault Lines, Plan Change 42 – General Rural and Rural Lifestyle Environments and Plan Change 43 – Taupō Industrial Land that our submission relates to.
 3. Refer to the table attached for the details of Federated Farmers' submission and whether we support or oppose the specific provisions on which we have submitted.
 4. The decisions sought by Federated Farmers are outlined in the table attached to this submission.
 5. We wish to be heard in support of this submission.
 6. Federated Farmers seeks any consequential changes necessary to give effect to the relief sought in each of the individual submission points made.

1.0 Introduction

- 1.1 Federated Farmers – Rotorua / Taupō (**Federated Farmers**) welcomes the opportunity to submit on the Taupō District Council's (**Council**) proposed plan changes to its district plan.
- 1.2 Federated Farmers acknowledges any submissions submitted by individual members.
- 1.3 Federated Farmers are a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses.
- 1.4 Farming has a strong presence in the Taupō district and contributes significantly to the wider Waikato and Bay of Plenty regions. Federated Farmers represent a variety of dairy, dry stock and horticulture land users and seeks to uphold and enhance the value of farming to the region. We have over 200 members located within the Taupō district.
- 1.5 Federated Farmers aim to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
- (a) our members may operate their business in a fair and flexible commercial environment;
 - (b) our members' families and their staff have access to services essential to the needs of the rural community; and
 - (c) our members adopt responsible management and environmental practices.
- 1.6 Federated Farmers is actively involved in district plan reviews across New Zealand. Primary production activities from our members make a significant contribution to the economic, social, and cultural well-being of New Zealand.
- 1.7 Our members want district plans that balances environmental, cultural, social, and economic values while ensuring rules are equitable, cost-effective, pragmatic and effects based. They also want district plans that are written in plain English; are easy to use and understand; acknowledge and reward the positive effects farming has on conservation; and recognise the importance of collaborating with communities to achieve desired environmental outcomes.
- 1.8 A lot of regulation has come at a significant cost on financial and mental health within the primary sector. Many of the costs are unnecessary and place additional pressure on the primary industry. Areas of discussion around climate change, biodiversity, outstanding natural features, and general land use activities need to be carefully considered to ensure that decision making with the consideration of the impacts of Councils decisions economically, socially, and environmentally.

2.0 General Comments

- 2.1 In general, farmers want a district plan that:
- (a) balances environmental, cultural, social, and economic values;
 - (b) ensures rules are equitable, cost-effective, pragmatic and effects based;
 - (c) is written in plain English, is consistent and follows a clear, user-friendly format;
 - (d) acknowledges and rewards the positive impacts farming has on conservation, and
 - (e) recognises the importance of collaborating with communities to achieve desired environmental outcomes.
- 2.2 There is an expectation that Councils, when undertaking a plan review, will adopt a no-frills approach and only target what is necessary to manage and resolve any issues occurring in the district and to meet their responsibilities under the Resource Management Act 1991 (RMA).
- 2.3 Federated Farmers can appreciate that given the uncertainty in future planning frameworks that will be required through the current resource management reforms. A focus on the parts of the district plan that have the most issues at present is a practical and pragmatic approach.

- 2.4 Our members who work and live rurally play a critical role for the community contributing in economic, social, and cultural aspects of the district. We wish to make this point clear to Council for consideration when undertaking decisions impacting rural people.
- 2.5 Rural ratepayers are constantly interacting with both natural and built resources and rely heavily on these resources. Farmers and primary producers are very aware of the importance of managing these resources effectively, responsibly, and sustainably to provide for the viability of both their businesses and the resources for future generations.
- 2.6 It is important that Councils use every means available to them to keep the costs imposed on farmers as low as possible. Farmers and growers are price takers and cannot pass on rising costs to consumers. Rising farming costs (including Council costs) are the key driver behind farmers needing to continually raise farm productivity to remain viable. This usually results in intensification and, in turn, may place additional pressure on the district's resources.
- 2.7 The importance of the economic use of land needs to be recognised throughout the District Plan. A sizable proportion of the district is dedicated to earning a living off the land, which provides not only for those families, but also to district and regional wealth.
- 2.8 A district plan should not be unnecessarily restrictive and should focus on non-regulatory methods such as education and partnerships rather than having a priority focus on regulation. Non-regulatory methods are effective in engaging resource users to collaborate with Councils towards achieving mutual goals and is a more efficient way of achieving 'buy-in' from resource users.
- 2.9 Resource users are more likely to engage and work proactively in partnership with Council when they have a sense of ownership of and responsibility for the targets and activities being conducted. It is important that resource users feel that they have played an active role in the decision-making process. Education is a valuable tool, particularly for issues that are not well-known or where perceptions need adjusting. As people gain more accurate knowledge about issues important in the region, misconceptions will reduce. As a result, people will be more willing to proactively engage in non-regulatory solutions.
- 2.10 Federated Farmers also believes that reducing misconceptions will result in more realistic and achievable community expectations. The need for some regulation is accepted but the Council needs to ensure that it is the most appropriate method before introducing a rule, or a requirement for landowners to adhere to.
- 2.11 Each plan change has been given its own section below. Each section clearly outlines the provisions which Federated Farmers has submitted on, the reasons for doing so and the relief sought.
- 2.12 In respect of our submissions, our suggested amendments are shown with ~~strikeout~~ for deletions and underlining for additional wording. In each of the individual submission points made, the decision sought includes any consequential amendments that may be required to any and all other related elements in the proposed plan.

PROPOSED PLAN CHANGE 38 – STRATEGIC DIRECTIONS

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Chapter 2 - Strategic Directions				
Page 2, Introduction	1	Support in part	<p>Federated Farmers supports the inclusion of a strategic direction chapter into the Taupō District Plan. It is important that the key strategic and significant resource management issues are defined in the district plan as they will play a vital role in influencing the direction the Council takes on behalf of its communities.</p> <p>Federated Farmers supports the proposed strategic directions, including tangata whenua, freshwater quality, urban form and development, climate change, strategic infrastructure and natural values and landscapes.</p> <p>The Taupō district has a significant rural presence and a considerable amount of rural land which is used for primary production. Federated Farmers seeks the protection of the values, character and resources of the general rural environment as it is defined in Proposed Plan Change 42 (subject to any amendments that have been sought).</p> <p>It is important that there is a strategic direction which recognises and provides for the rural economy and environment. Federated Farmers believes that the implementation of a strong rural economy and environment strategic direction would support and enable the continued use of rural land for rural production. It would also provide recognition that farming and other activities located within the general rural environment contribute significantly to the district as well as the wider region. Rural sustainability must include the protection of the existing land use activities such as primary production which have been present and operating in the rural environment for many years, if not decades. Primary production makes a substantial contribution to New Zealand's economy across national, regional and district levels.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the inclusion of a new strategic or significant resource management issue in Chapter 2 Strategic Directions focused on rural sustainability and the protection of the rural economy and environment within the Taupō district; and</p> <p>(b) the inclusion of the following objectives for the strategic direction rural sustainability or wording with similar intent:</p> <p style="margin-left: 20px;">2.X.X Objectives</p> <ol style="list-style-type: none"> 1. <i>The district's general rural environment is managed in a way that promotes rural sustainability while protecting rural land from inappropriate subdivision, land use and development;</i> 2. <i>Existing, lawfully established rural land use activities are recognised and protected from incompatible activities.</i> 3. <i>The value of the rural economy to the district and the wider region is acknowledged and provided for.</i> <p>(c) the inclusion of appropriate policies which will implement the proposed objectives outlined in (b) above; and</p> <p>(d) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Pages 3 and 4, 2.1 Strategic Direction 1 Tangata Whenua	2	Support	Federated Farmers supports the inclusion of strategic direction 1 in respect of tangata whenua. We also support the objectives and policies as outlined for the strategic direction as they are a positive step towards the district plan acknowledging and providing for the principles to Te Tiriti o Waitangi (the Treaty of Waitangi).	Federated Farmers seeks the following relief: (a) the retention of strategic direction 1 Tangata Whenua as currently written in the plan change or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Page 5, 2.2 Strategic Direction 2 Freshwater Quality / Te Mana o te Wai	3	Support in part	Federated Farmers supports the intent of this strategic direction. There is concern over the strategic direction as it is currently drafted that it is not consistent with the National Objectives Framework for the National Policy Statement for Freshwater Management 2020. ¹ The National Objectives Framework sets out the Te Mana o te Wai hierarchy that applies to all decision making in the freshwater space. The hierarchy is: 1. the health and wellbeing of waterbodies and freshwater ecosystems; 2. the health needs of people (e.g., drinking water); and 3. people and communities provide to provide for their social, economic and cultural wellbeing, now and in the future. The proposed strategic direction for freshwater needs to be rewritten to ensure that it achieves consistency with the National Objectives Framework and clearly sets out the defined process that the framework has defined. It is essential that the strategic direction supports the national direction that has been set by central government.	Federated Farmers seeks the following relief: (a) the amendment of strategic direction 2 Freshwater Quality / Te Mana o te Wai to achieve consistency with the requirement of the National Objectives Framework; and (b) any consequential amendments required as a result of the relief sought.
Pages 6 and 7, 2.3 Strategic Direction 3 Urban Form and Development	4	Support	Federated Farmers supports the strategic direction related to urban form and development as it is currently drafted in the plan change. It recognises that urban development creates additional demands on and for infrastructure and that there is a need for land use to be integrated with infrastructure development.	Federated Farmers seeks the following relief: (a) the retention of strategic direction 3 Urban Form and Development as currently written in the plan change or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.

¹ <https://environment.govt.nz/acts-and-regulations/freshwater-implementation-guidance/inf/> accessed at 8.15am on 9 November 2022.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Page 8, 2.4 Strategic Direction 4 Climate Change	5	Support in part	Federated Farmers supports the inclusion of a strategic direction that deals with climate change and how important it is to ensure that communities need to become climate change resilience. Policy 2.4.3(2) is not supported as it is currently written. There should be an acknowledgement that some land use activities have a functional need for occurring and that some may not be able to achieve a positive climate change outcome but are also not increasing their emissions into the environment.	Federated Farmers seeks the following relief: (a) the amendment of Policy 2.4.3 as currently written to read as below or with wording to similar effect; <i>2. Land use activities which will <u>will</u> unduly <u>overly</u> accelerate the effects of climate change will be discouraged recognising that some land use activities will be able to continue with no significant changes to their emissions output.</i> (b) and any consequential amendments required as a result of the relief sought.
Pages 9 and 10, 2.5 Strategic Direction 5 Significant and local infrastructure	6	Support in part	Federated Farmers supports strategic direction 5 as it is currently drafted including the objectives and policies. However, we seek an amendment to the policies so that it is acknowledged that infrastructure can (and does) have reverse sensitivity effects on existing land use activities such as farming and primary production. Federated Farmers recognises the importance for infrastructure to be able to be delivered safely and efficiently. However, it is important that the that the strategic direction tells the whole story. The provision of infrastructure can create conflict between the infrastructure provider and the landowner whose property the infrastructure is going on or over	Federated Farmers seeks the following relief: (a) the addition to Policy 2.5.3 of a new clause to read as below or with wording to similar effect; <i>6. To recognise the reverse sensitivity effects infrastructure may have on existing land use activities and to avoid, remedy or mitigate these effects where possible.</i> (b) and any consequential amendments required as a result of the relief sought.
Pages 11 and 12, 2.6 Strategic Direction 6 Natural Environment Values	7	Support in part	Federated Farmers supports the intent of strategic direction 6. The preservation of indigenous ecosystems and biodiversity has and will continue to create tensions between private landowners, Iwi and Councils. There are concerns that the proposed objectives and policies do not provide for existing activities to continue. There needs to be an additional objective and policy that recognises and provides for existing activities such as grazing and other farming activities to continue if the scale and intensity of effects do not / have not increased following the commencement date of the plan.	Federated Farmers seeks the following relief: (a) the amendment of strategic direction 6 Natural Environment Values to recognise and provide for non-regulatory methods as well as the role that private landowners play in the preservation of natural environment values; and (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			<p>It is felt that the objectives and policies for the strategic direction have missed the mark by not including engagement and education of private landowners in them.</p> <p>Federated Farmers supports the use of non-regulatory measures to assist landowners to continue this journey. The Council needs to be prepared to function as an intermediary so that effective partnerships can be established between all the parties involved with the protection of indigenous vegetation and fauna and natural values and landscapes to ensure the best possible outcomes. Private property owners will not appreciate having provisions imposed on them without having prior engagement.</p> <p>Natural character is a matter that Federated Farmers and its members are heavily invested in. Our members are constantly improving riparian margins and natural character on their land through planting, fencing, and retiring land with natural character from use. All this is done at their expense.</p> <p>It is important that the Council recognises and provides for in the district plan for activities that have a functional need to be located within an area of natural character. These activities are required to be located next to the resources that they utilise and cannot be located anywhere else. These activities need to be provided for as they form part of an existing working landscape.</p>	

PROPOSED PLAN CHANGE 41 – REMOVAL OF FAULT LINES

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Plan Change 41 Removal of Fault Lines				
Entire Plan Change	1	Support in part	<p>Federated Farmers supports in part this plan change. The removal of outdated data from the district plan is essential to ensure the plan stays up-to-date and useful to plan users.</p> <p>However, the removal of the fault lines from the district panning maps, raises the issue of how plan users will be able to determine whether a proposed activity will require resource consent. The district plan rules require a buffer twenty metre either side of fault lines as being unsuitable for any structure (excluding network utility lines, cables, and pipelines). Structures within 20m of the mapped fault line requires resource consent.</p> <p>While the removal of the outdated fault lines and associated provisions from the district plan maps means that more accurate data can be relied upon for subdivision and development resource consents and building consents, it is uncertain if plan users will be able to access this data. This creates an unfairness as without the fault lines being identified in the District Plan, the subdivision consent and Building Act/ building consent processes will be the primary mechanisms for ensuring that the risks posed to buildings from potential fault lines are mitigated.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the retention of a reference in the district plan that tells plan users where they can access the up-to-date data on fault lines; and (b) that the Council provides access to the up-to-date fault line data from the GNZ report to district plan users; and (c) any consequential amendments required as a result of the relief sought.

PROPOSED PLAN CHANGE 42 – GENERAL RURAL AND RURAL LIFESTYLE ENVIRONMENTS

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Section 10 – General Rural and Rural Lifestyle Environments				
Page 3, Section 10 Definitions	1	Support in part	<p>Federated Farmers supports the inclusion of the proposed new definitions. In respect of the definition for stock proof fence it is recommended that the Council incorporates the full definition from Schedule 2.7 of the Fencing Act 1978. This would make it easier for users of the district plan as they will not have to go to a different place to find out the requirements are for a stock proof fence.</p> <p>The new definition for papakāinga is supported as it better reflects the concept of how tangata whenua live and work in this space.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the definition for stock proof fence so that it reads: <i>Stock Proof Fence - A 9 or 10 wire fence: as described in Schedule 2.7 of the Fencing Act 1978, a substantial wire fence having 9 or 10 wires properly strained, with or without battens (droppers) or lacing affixed to the wires between the posts or standards; the posts or standards to be of durable timber, metal, or reinforced concrete, well and substantially erected, and not more than 5 m apart, the top wire not to be less than 1 m from the ground surface, the wires to be galvanised, and of 2.5 mm high tensile steel or 4 mm steel, or its equivalent, the space between the ground and the bottom wire not to exceed 100 mm, the 4 bottom wires to be not more than 130 mm apart.</i></p> <p>(b) the retention of the proposed definition for papakāinga as currently drafted or with wording to similar effect; and</p> <p>(c) any consequential amendments required as a result of the relief sought.</p>
Page 3, Section 10 Definitions	2 and 3		<p>Federated Farmers seeks the inclusion of definitions for the following terms:</p> <ul style="list-style-type: none"> highly productive land; and minor residential units <p>as these terms are used frequently throughout the plan change text. Providing definitions for these terms will provide clarity to plan users.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the inclusion of definitions in chapter 10 of the district plan for the terms ‘highly productive land’ and ‘minor residential units; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Pages 5 to 7, 3b Rural Environment Chapter, 3b.1 Introduction	4	Support	<p>The recognition of the need to ensure that other activities do not affect the ability of the rural environment to function effectively is strongly supported. Federated Farmers also supports the acknowledgement of the functional need of rural</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of 3b.1 Introduction to the rural environment chapter or with wording to similar effect; and</p>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Pages 7 and 8, 3b Rural Environment Chapter, 3b.2 Objectives and Policies – General Rural Environment Objectives	5	Support in part	<p>activities to be located within the rural environment and the potential for reverse sensitivity effects to occur from their continued operation.</p> <p>Federated Farmers has concerns over the way in which the objectives have been written. The objectives do not read as a statement of what is to be achieved through the resolution of a particular issue.</p> <p>An objective should state what is to be achieved, where and when. With the current objectives, the matter of ‘when’ is not addressed and it is uncertain how it would be known what the objectives have been met.</p> <p>The objectives have also been written as absolute targets in that matters are to be protected or avoided. Again, there will be difficulty in assessing the achievement of these objectives which require absolute outcomes.</p> <p>Federated Farmers has concerns over Objective 3b.2.6 which deals with the impacts on infrastructure from subdivision and development. We recognise that for some essential infrastructure there will be a need to locate in the rural environment. However, the objective also should acknowledge that essential infrastructure can cause reverse sensitivity effects on activities located in the rural environment.</p> <p>Objective 3b.2.4 as currently drafted is inconsistent with Part 2 of the Resource Management Act 1911. It is not appropriate that the objective does not address both sides of the issue or that it seeks to protect all infrastructure from the effects of all subdivision and development.</p>	<p>(b) any consequential amendments required as a result of the relief sought.</p> <p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the objectives for chapter 3b Rural Environment so that they clearly state what is to be achieved, where the objective is to be achieved and when the objective will be achieved; and</p> <p>(b) the amendment of objective 3b.2.6 so that it reads as follows or with wording to similar effect:</p> <p>Objective 3b.2.6 Impacts on essential infrastructure The impacts on <u>essential</u> infrastructure arising from inappropriate subdivision, <u>use</u> and development are managed <u>avoided, remedied or mitigated where it is possible to do so.</u></p> <p>(c) the insertion of a definition for ‘essential infrastructure’ into the district plan; and</p> <p>(d) any consequential amendments required as a result of the relief sought.</p>
Pages 8 and 9, 3b Rural Environment Chapter, 3b.2 Objectives and	6	Support in part	<p>Federated Farmers supports in part the proposed policies as they are currently written. However, the policies do not appear to meet the best practice guidelines set by Quality Planning.²</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the policies for chapter 3b Rural Environment so that they clearly state how the objective will be</p>

² <https://www.qualityplanning.org.nz/node/610> accessed at 12.18pm on 14/11/2022.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Policies – General Rural Environment - Policies			<p>Policies are intended to define the course of action to achieve or implement an objective. Policies need to be written to provide clear direction to decision makers who will be making the decisions on the methods and/or rules used to implement the policies.</p> <p>Policies need to be written to address effects. This requires consideration of the following:</p> <ul style="list-style-type: none"> • How will the policy meet the relevant objective? • Where in the district or region does the policy apply? • What action is required to be taken and when (i.e., under what circumstances). • Who is required to comply with the policy and who will implement the policy? <p>It is also difficult to determine what objectives some of the policies are related to. For example, it is not clear which policy is related to objective 3b.2.1 Enable Primary Production and objective 3b.2.3 Rural Industry. The focus appears to have been taken off these matters and placed on commercial and industrial activity.</p> <p>In addition, it is not clear which policy connects to objective 3b.2.6 Impacts on Infrastructure. For objectives and policies to be effective and provide clear directions for methods and rules, they need to relate to each other. Policies should address all the objectives defined so that there is a clear connection to the methods or rules to be used to implement the objectives and policies.</p>	<p>met by this policy, where in the region or district will the policy apply, what course of action is to be taken and when, and who is required to comply with the policy and who is to implement the policy; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Pages 10 and 11, 3b Rural Environment Chapter, Objectives and Policies – Rural Lifestyle Environment Objectives	7	Support	<p>Federated Farmers supports the objectives as they are proposed for the rural lifestyle zone.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of objectives 3b.3.1 to 3b.3.8 as currently drafted or with wording to similar effect; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Pages 11 and 12, 3b Rural Environment Chapter, 3b.3 Objectives and Policies – Rural Lifestyle Environment - Policies	8	Support	Federated Farmers supports the policies as they are currently drafted for the rural lifestyle zone.	Federated Farmers seeks the following relief: (a) the retention of policies 3b.3.9 to 3b.3.14 as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Pages 12 to 18, Rules and Standards - Rural Environment – 4b.1 General Rules – Rural Environment	9	Support	Federated Farmers supports the general rules for the general rural environment as they are currently drafted. The rules as proposed allow for the continuation of existing, lawfully established activities within the rural environment without any unnecessary obstacles.	Federated Farmers seeks the following relief: (a) the retention of policies 3b.3.9 to 3b.3.14 as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Pages 18 to 22, Rules and Standards - Rural Environment – 4b.2 Performance Standards – General Rural Environment	10	Support	Federated Farmers supports performance standards 4b.2.1 to 4b.2.5 and 4b.2.7 to 4b.2.15. The performance standards allow for continuation of existing, lawfully established activities within the rural environment without any unwarranted barriers.	Federated Farmers seeks the following relief: (a) the retention of performance standards 4b.2.1 to 4b.2.5 and 4b.2.7 to 4b.2.15.as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Pages 18 to 22, Rules and Standards - Rural Environment – 4b.2 Performance Standards – General Rural Environment 4b.2.6	11	Oppose	Federated Farmers opposes the performance standard as it is currently drafted. Performance standard 4b.2.6 (iv) requires a minimum setback of two hundred metres from all boundaries for buildings for the management of farmed animals from all boundaries. For the purposes of this performance standard, farmed animals means (but is not limited to) buildings used for accommodating livestock of farmed animals either overnight or for a period during the day, and includes cow milking sheds, calf sheds, buildings used to house intensive farming activities, poultry farming activities, feed pads, animal boarding facilities and stables. The current setback from boundaries for the rural environment is 15-25m (depending on the situation and application). The proposed change is significant and has the potential to	Federated Farmers seeks the following relief: (a) the amendment of the required setback in performance standard 4b.2.6 (iv) from 200m to 25m from residential buildings and community facilities; and (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			<p>significantly impact on our farming members. It may prove impractical or impossible to meet the new proposed setback of 200m.</p> <p>As previously highlighted to the Council, we question what the issue is that the proposed increase in the setback is trying to address. We note that farmed animals and associated buildings are anticipated in the rural environment, and consequently so are any reasonable and permitted noises, odours and effects on rural amenity.</p> <p>Federated Farmers proposes that a 25m setback be required from any residential units or community facilities (such as churches, schools, halls etc.) regardless of whether where the boundary is located. This will strike an appropriate balance between addressing potential effects on people and aesthetics of rural living, while being more practical for farming operations as the dominant land use in the GRE.</p>	
Pages 23 to 25, Rules and Standards - Rural Environment – 4b.3 General Rules – Rural Lifestyle Environment	12	Support	<p>Federated Farmers supports the general rules that are proposed for the rural lifestyle environment.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the retention of general rules 4b.3.1 to 4b.3.7 as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Pages 26 to 28, Rules and Standards - Rural Environment – 4b.4 Performance Standards – Rural Lifestyle Environment	13	Support	<p>Federated Farmers supports the performance standards proposed for the rural lifestyle environment. The standards provide for the development of an appropriate rural lifestyle and seeks to avoid or minimise any adverse effects on adjoining rural environments.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the retention of performance standards 4b.4.1 to 4b.4.24 as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Pages 28 to 32, 4b.5 Subdivision Rules – 4b.5.1 Subdivision – General Rural Environment and	14	Oppose in part	<p>Federated Farmers has concerns over how the rule is currently drafted. A minimum size of ten hectares has been used to determine whether a subdivision is a controlled activity or whether it becomes non-complying.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the amendment of rule 4b.5.1 to provide for all subdivision in the rural zone as a controlled activity provided certain performance standards are met; and

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
associated performance standards			<p>This creates unwarranted barriers and costs for farmers and other landowners in the rural environment. Council subdivision and development policies and rules should provide for managed growth in rural communities. While acknowledging that the loss of productive land can impact on the district's economy, there is also a need to recognise that farmers undertake small lot subdivision to provide for farm succession, dispose of surplus dwellings and for providing on-farm accommodation for employees.</p> <p>A lot of time and money will need to be spent on a non-complying activity resource consents which potentially could end up being publicly notified and go to a hearing when all that is sought is for a subdivision of land around an existing residential dwelling. This is customary practice for retiring farmers who are looking to hand the on-going operation of a farm over to other people.</p> <p>It is important to realise that there are several activities occurring in the rural zone. The district plan should not put unnecessary barriers in place that prevent landowners from achieving the best use possible of their land.</p> <p>There is also benefit that can be seen for subdivision and development in the rural environment, which will bring people back to the rural communities, increasing the number of ratepayers and increase the number of people that can support existing facilities in rural townships.</p> <p>Federated Farmers supports the performance standards given for rule 4.5.1 (i) as currently drafted.</p>	<p>(b) provide for the subdivision of rural land down to four hectares in size or relief with similar intent; and</p> <p>(c) the retention of the associated performance standards for this rule as currently drafted or with wording to similar effect; and</p> <p>(d) any consequential amendments required as a result of the relief sought.</p>
Pages 28 to 32, 4b.5 Subdivision Rules – 4b.5.8 Subdivision – Bonus Lots	15	Support in part	<p>Federated Farmers would like to acknowledge the work the Council has done on improving this rule since the first version of it was released. The rule is now clear and is easy to understand.</p> <p>The new activity classification of restricted discretionary is supported for the creation of new bonus lots.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of rule 4b.5.8 to allow for the creation of bonus lots in conjunction with outstanding natural landscapes or features and other similar areas; and</p>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			<p>There is concern over the fact the proposed rules appears only to allow for the creation of bonus lots that are connected to or providing protection for Significant Natural Areas. This limitation to significant natural areas does not provide incentive or encouragement for the long-term protection of other features located within the rural environment. Federated Farmers requests that the Council provides for the environment gains that can be achieved by other areas (such as Outstanding or Amenity Landscape Areas, Foreshore Protection Area, etc), being able to be utilised as bonus lots.</p>	<p>(b) any consequential amendments required as a result of the relief sought.</p>

PROPOSED PLAN CHANGE 43 – TAUPŌ INDUSTRIAL ENVIRONMENTS

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Plan Change 43 Taupō Industrial Environment and Centennial Industrial Environment				
Entire Plan Change	1	Support	<p>Federated Farmers supports proposed plan change 34 in its entirety. The new land to be rezoned is located adjacent to the existing industrial zone which should allow for easy access to the required infrastructure.</p> <p>The industrial zone is located on the edge of Taupō, and it makes sense to rezone land next to the existing zone rather than locating a new industrial zone elsewhere where it could impact on the rural environment.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(d) the retention of the proposed plan change as currently drafted or with wording to similar effect; and</p> <p>(e) any consequential amendments required as a result of the relief sought.</p>



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I could

I could not

Gain an advantage in trade competition through this submission

I am

I am not

directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Plan Change 38 - Strategic Directions

Points: 93.1

**What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment**

1.1. Contact seeks the relief set out in **[its submission]**.

1.2. Include an Energy Chapter in the Taupō District Plan in accordance with the National Planning Standards, either as a result of Plan Change 38 or by way of a subsequent Proposed Plan Change in the near future.

Include reason(s) for your submission point

1.1. Contact's detailed points of submission are set out in **[its submission]**.

1.2. More generally, Contact seeks the inclusion of an Energy Chapter in the Taupō District Plan in accordance with the National Planning Standards, either as a result of Plan Change 38 or by way of a subsequent Proposed Plan Change in the near future.

1.3. There are more than 20 power stations in the Taupō District making renewable electricity generation one of the most significant activities in the Taupō District. The ongoing operation of existing renewable electricity generation activities and the development of additional renewable electricity generation capacity is one of the most important resource management issues facing the country (and the planet) in order to address climate change by decarbonising the economy.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions

Points: 93.2

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend the introduction to Chapter 2 Strategic Directions to read as follows:

Chapter 2 Strategic Directions

The following chapter provides an outline of the key strategic and significant resource management matters for the Taupō ~~e~~District. This chapter includes objectives and policies to guide decision making at a strategic level.

The strategic objectives set the direction for the District Plan and help to implement the Council's community outcomes. They are indicative of the matters which are important to the Taupō District community and reflect the intended outcomes to be achieved through the implementation of the District Plan.

The strategic directions will be particularly relevant for any future changes to the Plan and any significant resource consent applications where there is a requirement to consider District Plan policy.

This chapter should be read as a whole and applied across the district and all zonings unless the provisions relate to a specific zoning or part of the District.

This chapter does not include rules. Relevant rules can instead be found in the chapters under the District Wide and Area Specific headings of the Plan.

The key strategic or significant resource management matters ~~for the district~~ for the Taupō District are:

1. Tāngata Whenua
2. Fresh Water Quality
3. Urban Form and Development
4. Climate Change
5. Strategic Infrastructure
6. Natural Values and Landscapes

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.1 Strategic Direction 1

Tangata Whenua

Points: 93.3

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend to read as follows:

2.1 STRATEGIC DIRECTION 1 TANGATA WHENUA

The Council, through the District Plan, is required to take into account the principles of the Te Tiriti o Waitangi. This is to be done at all levels of planning and decision making under the Plan. A comparatively high proportion of the district is Māori freehold or multiple-owned land. There is a strong desire for Māori to return to their ancestral land, with a range of aspirations for changed land use, land development and settlement, whilst exercising kaitiakitanga and protecting sites of cultural significance. The District Plan has an important role to play in supporting mana whenua in achieving these aspirations.

The Council is also required to, in partnership with mana whenua, recognise and provide for the Māori values in resource management and decision making. These include the important relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga and to have particular regard to kaitiakitanga.

This is to happen not just through recognition and incorporation of these matters into the Plan but also the wider decision making and plan implementation process. These values should not be considered as a separate matter to the wider plan but are expected to be applied throughout all aspects of planning and decision making within the Taupō District.

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.1 Strategic Direction 1

Tangata Whenua > 2.1.2 Objective

Points: 93.4

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend to read as follows:

2.1.2 Objectives

1. The values, rights and interests of Taupō District mana whenua are recognised and protected.
2. Mana whenua are a partner in District Plan planning and decision making.
3. Resource management planning and decision making reflects tikanga, mana whakahaere, kaitiakitanga, manaakitanga, whakapapa, mautaranga Māori and te whanake.
4. Support development on Māori land that meet the needs of those landowners and respects the exercise of kaitiakitanga, self-determination and the relationship of tāngata whenua with their land, water, significant sites and Wāhi tapu.
5. Māori are supported to develop their ancestral lands for their social, economic and cultural wellbeing.
6. The principles of te tiriti o Waitangi are taken into account through District Plan planning and decision making.

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.1 Strategic Direction 1

Tangata Whenua > 2.1.3 Policy

Points: 93.5

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend to read as follows:

2.1.3 Policies

1. Recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu (sacred sites), and other taonga (treasures).
2. Provide for development on Māori land that enables tāngata whenua:
 - a. to act in a way that is consistent with their culture and traditions
 - b. to fulfil cultural, economic and social aspirations of those owners
 - c. enhance their ability to exercise kaitiakitanga
 - d. strengthens their relationships with land, water, significant sites and Wāhi tapu.
3. Recognise the importance of mātauranga Māori, kaitiakitanga and tikanga Māori in landuse planning and decision making.
4. Recognise and support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki.
5. Recognise the wider constraints on the utilisation and development of Māori land as different from land in freehold title.
6. Enable development of Māori Land within the provisions of the plan for the purposes of fulfilling the economic and social aspirations of those owners.
7. Provide opportunities for Māori involvement in decision-making and monitoring of the District Plan, resource consents, designations and heritage orders including in relation to sites of significance to Māori and issues of cultural significance.
8. Recognise, in decision making, the importance of iwi environmental management plans in providing important guidance and direction on the sustainable use and development of the environment and natural resources.
9. Recognise and support the incorporation of mātauranga Māori principles into the design, development and/or operation of land use activities.

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.2 Strategic Direction 2

Freshwater Quality / Te Mana O Te Wai

Points: 93.6

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend to read as follows:

2.2 STRATEGIC DIRECTION 2 FRESHWATER QUALITY / TE MANA O TE WAI

The health and wellbeing of the lakes and rivers in the district have been degraded both directly and indirectly over recent decades. This degradation includes declining water quality, loss of indigenous biodiversity, loss of access and declining water availability and is the result of activities both on land and in the water bodies themselves. Waterways continue to face increasing demands for use, such as takes for irrigation and drinking water, hydro power generation, and assimilation of discharges from towns, agriculture and other industry; as well as pressures arising from land management practices, land use change and intensification. Holistic and integrated management of land and water resources is critical to reversing declining trends.

The Taupō District Plan has a ~~responsibility role to assist with to the management of the~~ adverse effects on the environment that may arise from subdivision and land use in the District. Managing the adverse effects on waterways resulting from subdivision and land use forms part of that responsibility and there are clear benefits from doing this. The state of the District's freshwater resources is of significant interest to the Taupō District community, and it is important that positive freshwater outcomes are achieved through the ~~application implementation~~ of the Plan.

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.3 Strategic Direction 3 Urban Form and Development Points: 93.7

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Seek amendment

2.3 STRATEGIC DIRECTION 3 URBAN FORM AND DEVELOPMENT

The Taupō ~~District District's~~ diverse and growing population has led to increased demand for housing and demand for new commercial and industrial areas. Urban development also generates further demand for infrastructure services, particularly development infrastructure such as three waters and transportation services. The District Plan provides a framework for ensuring that urban development, subdivision and changes in land use occurs in a planned and efficient manner and is adequately serviced by infrastructure (including development ~~and of~~ additional infrastructure).

The strategic directions for urban development establish the approach for urban form and development within the Plan as identified through the 2018 District wide growth management strategy, Taupō District 2050. This approach reflects ~~the~~ an efficient and effective urban form which will develop in a manner that is appropriately serviced by infrastructure reflects the important values and communities within the District.

As well as green field development, the plan provides important guidance about the protection of existing urban areas, including Town Centres, to enable them to continue to function effectively in a manner that best serves the wider District.

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.3 Strategic Direction 3 Urban Form and Development > 2.3.2 Objectives Points: 93.8

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Seek amendment

2.3.2 Objectives

1. The district develops in a cohesive, compact and structured way that:
 - a. contributes to well-functioning and compact urban forms that provide for connected liveable communities;
 - b. enables greater social and cultural vitality and wellbeing, including through recognising the relationship of tāngata whenua with their culture, traditions, and taonga;
 - c. ensures infrastructure is efficiently and effectively integrated with land use; and
 - d. meets the community's short, medium and long-term housing and business needs.
2. Subdivision, use and development of land will be consistent with TD2050 2018 to maximise the efficient use of zoned and serviced urban land and is co-ordinated with the provision of cost effective infrastructure.
3. Subdivision, use and development of land ~~in appropriate locations~~ which will have demonstrable social and cultural benefits to the District's community will be supported.
4. Development is serviced by an appropriate level of infrastructure that effectively meets the needs of that development.
5. The Town Centre Environment is strengthened and reinforced as the primary commercial, retail, recreational, cultural and entertainment centres ~~s~~ for Taupō District.
6. Subdivision, use and development will not detract from the planned urban built form and effective functioning of the environment which it is located.
7. Subdivision is designed to avoid, remedy or mitigate adverse effects on the environment and occurs in a sequenced and coherent manner that protects or enhances the important natural values of the environment where it is located.

~~8. The East Taupō Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including renewable electricity generation activities.~~

Include reason(s) for your submission point

An important aspect of the urban form of Taupō is the East Taupō Arterial being an 'urban fence' separating urban activities to the west (particularly residential activities) from industrial and rural activities to the east including renewable electricity generation activities. It is important to reinforce this as an enduring objective in the District Plan. The separation of incompatible activities is one of the most fundamental principles of sound planning and resource management practice. The ability to utilise the Wairākei-Tauhara Geothermal System for renewable electricity generation purposes, unfettered by the establishment of compatible urban activities, is recognised as a matter of both regional and national significance in the Waikato Regional Policy Statement (RPS) and the National Policy Statement for Renewable Electricity Generation (NPS-REG). The District Plan has a role to play in implementing the RPS and the NPS-REG.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.3 Strategic Direction 3 Urban Form and Development > 2.3.3 Policy Points: 93.9

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Seek amendment

Amend to read as follows:

2.3.3 Policies

1. Identify and zone appropriate areas of land for urban purposes to guide the future provision of

infrastructure within the Taupō District.

2. Planning and development in urban environments will positively contribute to well-functioning urban environments.
3. Subdivision, use and development of land will be consistent with TD2050 to maximise the efficient use of zoned and serviced urban land and is co-ordinated with the provision of effective infrastructure.
4. Avoid fragmented development that results in inefficiencies in the provision of infrastructure and landuse.
5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development **and of** additional infrastructure), according to the capacity limitations of that infrastructure.
6. Provide for subdivision, use and development of land that will lead to demonstrable beneficial social and cultural outcomes for the District's community.
7. Provide for the development of Papakāinga on **mMāori** land to facilitate **mMāori** occupation on their ancestral lands.
8. Maintain strong boundaries to the town centre to consolidate and intensify retail, commercial and office activities within the city centre and protect the planned urban built form of residential neighbourhoods.
9. Restrict the location and development of retail and commercial activities within non-commercial areas of the district to ensure that the town centre continues to be the **district district's** pre-eminent retail, commercial and mixed-use centres.
10. Manage subdivision use and development of land to ensure that it will not:
 - a. have an adverse effect on the functioning of the environment where it is located,
 - b. unduly conflict with existing activities on adjoining properties **and the surrounding areas**,
 - c. compromise development consistent with the intent and planned urban built form of the environment where it is located
 - d. give rise to reverse sensitivity effects **from existing uses**
11. Require the design and location of activities to avoid or mitigate natural hazards to an acceptable level of risk to life, property and the environment.
12. Do not support subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values.
13. Ensure that new urban subdivision and land development is designed in a manner that enables effective and logical multi modal transportation links to the surrounding, including planned, urban areas.

Include reason(s) for your submission point

There are a number of typos that need to be corrected and other edits.

Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. Reverse sensuosity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change

Points: 93.10

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

2.4 STRATEGIC DIRECTION 4 CLIMATE CHANGE

Climate change has been identified as an issue which is important **globally and** within the Taupō District. A warming environment, longer and drier droughts and increased intensity of storm events are anticipated. It is important that the District and its communities **are able to** adapt to the effects of climate change to be resilient and safe.

For environmental management and planning purposes there are two separate, but important aspects of climate change:

1. Effects on climate change – which refers to activities that may lead to an increase in greenhouse gasses and those which may result in a reduction of greenhouse gasses **from discharged to** the atmosphere or help to facilitate efforts towards decarbonisation, **including the electrification of home heating, transport and industry**.
2. Effects of climate change – which are the effects caused by climate change such as more frequent flooding, droughts or intensive weather events which can endanger communities, assets and infrastructure.

It is important to consider both of these aspects of climate change to effectively enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety. Supporting positive climate change outcomes and ensuring that the effects of climate change are recognised and provided for will assist in planning for a district which **helps avoid**, does not contribute to, and is resilient to, climate change. The Strategic Directions for climate change are consistent with the Government's obligations to achieve net zero carbon emissions by 2050, and accords with the target for 100% renewable electricity generation by 2030.

Include reason(s) for your submission point

Climate change is one the most significant issues facing the entire planet. As noted in the following section of the Plan (Section 2.5 Strategic Direction 5 Significant and Local Infrastructure), The Taupō District provides up to 20% of New Zealand's electricity supply. There are more than 20 renewable electricity power stations in the Taupō District, mostly located in the Rural Environment. It is therefore one of the most significant land uses in the Taupō District.

The importance of renewable electricity generation needs to be recognised and provided for in the Taupō District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupō District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change > 2.4.2 Objective

Points: 93.11

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

2.4.2 Objectives

1. Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes.
2. An increase in the amount of electricity generated from renewable sources within the Taupō District to assist with the decarbonisation of the economy.
2. Subdivision, use and development of land in the Taupō District will be resilient to the current and future effects of climate change on the District's current and future communities, including any disproportionate effects on Māori.
3. The Taupō District is well prepared to adapt to the risks and effects from climate change, such as natural hazards.

Include reason(s) for your submission point

A new objective needs to clearly articulate the desirability of increased renewable electricity generation to assist with the decarbonisation of the economy (both within the Taupō District, regionally and nationally).

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change > 2.4.3 Policy

Points: 93.12

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

2.4.3 Policies

1. Land use activities which will result in positive climate change outcomes, including through reducing greenhouse gas emissions and decarbonisation, will be supported and encouraged.
2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity and improved security of supply including transmission.
3. Enable the upgrading and maintenance of existing and development of new renewable electricity generation activities and transmission, including where contributing to one of the following:
 - adaptation required to mitigate risks from climate change
 - provides for increased electricity output, or greater efficiency
 - continued safe, efficient and secure operation.
24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.
35. Urban and built development must be designed in a manner which considers the need to reduce greenhouse gas emissions associated with that development and resulting land use.
46. Subdivision, use and development of land must demonstrate resilience to the effects of climate change over time.

Include reason(s) for your submission point

Policies need to be included which specifically provide for and enable activities that will help address climate change.

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: 93.13

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE

Infrastructure, as defined in the Resource Management Act generally encompasses physical services and facilities which enable society to function, such as the three waters network, transport, communications, **energy electricity** generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators.

Infrastructure is critical to the social and economic wellbeing of people and communities, including providing for their health and safety, and has national, regional and local benefits. However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure **and the natural resources on which they rely on to operate.**

The Taupō District plays an important role in the location and provision of nationally 'significant infrastructure'. Its central location and natural resources means that Taupō is home to:

- State highways (1, 5, 32, 41 and 47).
- the national grid electricity transmission network
- renewable electricity generation facilities **that connect with the national grid**, accounting for up to 20% of New Zealand's total electricity demand
- Airports used for regular air transport services by aeroplanes

The Taupō District is also home to Regionally Significant Infrastructure including municipal waste water systems, the telecommunications and electricity networks.

In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the **District District's** urban and rural communities.

Include reason(s) for your submission point

The introduction should more accurately refer to "electricity generation" and not "energy generation".

Renewable electricity generation activities is regionally significant whether or not it is connected to the national grid.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure > 2.5.2 Objectives

Points: 93.14

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Retain the following Objectives:

2.5.2 Objectives

1. The wider benefits and strategic importance of nationally and regionally significant infrastructure to the District and wider, including the economic, cultural and social wellbeing of people and communities and for their health and safety, are recognised **and protected** in decision making and land use planning.
2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and **encouraged achieved.**
3. Land use in the District will not adversely affect the capacity and the safe and effective functioning of nationally and regionally significant and local infrastructure required to service existing and future communities.
4. Local and national transport infrastructure located in the Taupō District operates in a safe and effective manner.

Include reason(s) for your submission point

Minor additions are sought to the policies.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure > 2.5.3 Policy

Points: 93.15

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend to read as follows:

2.5.3 Policies

1. Recognise and provide for the national, regional and local benefits of renewable **energy electricity** generation

activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.

2. Recognise **and provide for** the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.
3. Subdivision, landuse and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure.
4. Planning and development of infrastructure will consider the needs and the wellbeing of current and future communities.
5. Recognise that infrastructure can have important environmental, economic, cultural and social effects.

Include reason(s) for your submission point

The introduction should more accurately refer to “electricity generation” and not “energy generation”.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.6 Strategic Direction 6
Natural Environment Values

Points: 93.16

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend to read as follows:

2.6 STRATEGIC DIRECTION 6 NATURAL ENVIRONMENT VALUES

The Taupō **ed**istrict is characterised by important landscapes and natural areas. These areas are a strong part of the identity to the district and are valued by the local communities and also hold importance nationally. As well as being an important part of the **District District's** identity, these areas also have a range of important social, cultural and environmental (including intrinsic) values.

The effects of human activities such as built development, vegetation clearance and land development **ete**: can significantly alter the character of the environment resulting in the loss of these areas and their values. While parts of the District have been significantly modified by human activity, vast areas of the natural landscape remain.

These areas are on a range of public (reserve, forest and national parks) and private **tenure land**. There is also a high proportion of these areas on **m**Māori land throughout the District which can impact the ability of **m**Māori landowners in undertaking development on their ancestral lands.

Include reason(s) for your submission point

Minor edits.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.6 Strategic Direction 6
Natural Environment Values > 2.6.2 Objectives

Points: 93.17

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

2.6.2 Objectives

1. Recognise the importance of the **District District's** natural values and landscapes and their significance to the Taupō **District District's** communities and identity.
2. The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna from the adverse effects of inappropriate development.
3. Activities which will lead to the enhancement of indigenous biodiversity values will be recognised and provided for.
4. Recognition of the extent of indigenous vegetation and habitat **under on** Māori land **tenure**, and the need to provide for the important relationship of Māori and their culture and traditions with their ancestral lands and waahi tapu.
5. The protection of outstanding landscape areas from inappropriate land use and development which may adversely affect their landscape attributes.
6. Recognition of the relationship of tāngata whenua with the natural values of their ancestral lands, waterbodies, sites, cultural landscapes, and other natural taonga of significance.
7. The natural character of riparian margins are preserved, and enhanced where appropriate, and protected from inappropriate subdivision, use and development.

Include reason(s) for your submission point

Minor edits.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.6 Strategic Direction 6
Natural Environment Values > 2.6.3 Policy

Points: 93.18

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend to read as follows:

2.6.3 Policies

1. Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will have more than minor effects on the ecological values and processes important to those areas.
2. Support and facilitate those activities which will lead to the long term protection and or enhancement of indigenous biodiversity values.
3. Recognise and provide for tāngata whenua in their role as kaitiaki of the natural values on their lands and the wider district.
4. Activities must recognise and maintain the attributes of identified outstanding natural features and landscapes and not have any more than minor adverse effects on them.
5. Encourage the protection, enhancement and restoration of natural and landscape value areas, including by supporting opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki in restoring, protecting and enhancing these areas.
6. Recognise the contribution made by landowners to the protection and enhancement of areas of natural values and landscapes.

7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure.

Include reason(s) for your submission point

Minor edits are proposed and the addition of one additional policy which covers an increasingly important aspect of consenting renewable electricity generation activities.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.2 Strategic Direction 2
 Freshwater Quality / Te Mana O Te Wai > 2.2.2 Objective

Points: 93.19

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain the objective.

Include reason(s) for your submission point

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.2 Strategic Direction 2
 Freshwater Quality / Te Mana O Te Wai > 2.2.3 Policy

Points: 93.20

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain the Policy.

Include reason(s) for your submission point

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.2 Strategic Direction 2
 Freshwater Quality / Te Mana O Te Wai > 2.2.3 Policy

Points: 93.21

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain the Policy.

Include reason(s) for your submission point

Provision: Plan Change 41 - Removal of Fault lines

Points: 93.22

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Support

Contact seeks that Taupō District Council adopts PC41 as notified.

Include reason(s) for your submission point

Contact supports PC41 in its entirety. It is important that resource management decisions are made with the best available information.

Contact supports the deletion of fault lines from the planning maps and the associated rule in Section 4e.10 of the Taupō District Plan. Dealing with any risks associated with fault lines at the subdivision and/or building consent stage of a proposed development is efficient and appropriate.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: 93.23

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Seek amendment

Contact seeks the relief set out in **Attachment A [to its submission]**.

To the extent that the relief sought as set out in Attachment A is not accepted, Contact seeks any alternative relief which will have the same or similar effect.

Include reason(s) for your submission point

Contact's detailed points of submission are set out in [its submission].

Contact supports the creation of Rural Lifestyle Zones on the basis that they can provide for rural residential activities in appropriate locations. However, a key aspect of Contact's submission is seeking to ensure that Rural Lifestyle Zones are only created in appropriate locations which does not include within or in close proximity to permitted, lawfully existing and/or consented renewable electricity generation activities.

If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to avoid reverse sensitivity effects. That is the approach that has been taken in this submission. If Contact's relief sought in relation to the location of Rural Lifestyle Zones is not accepted, then Contact seeks alternative relief (including additional changes to the rules and performance standards relating to the Rural Lifestyle Environment) which will avoid the creation of reverse sensitivity effects.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Amendments to the Definitions of the Taupō District Plan Section 10

Points: 93.24

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Oppose

Amend the definition of **Rural Industry** as follows:

Rural Industry – an activity that directly supports, services, or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, and dairy farming and geothermal/electricity generation.

Insert a new definition of Renewable Electricity Generation as follows (being the same definition in the NPS-REG): Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal,

wave, or ocean current energy sources.

Include reason(s) for your submission point

Contact opposes the inclusion of “geothermal / electricity generation” within the definition of Rural Industry.

Renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance. Renewable electricity generation is also an activity identified in the Waikato RPS and Bay of Plenty RPS as a Regionally Significant Infrastructure. It is therefore inappropriate to treat that activity as part of, and in the same manner as, other activities that occur in the rural environment such as forestry, agriculture and dairy farming. The elevated status and importance of renewable electricity generation should be recognised in the Taupō District Plan with its own set of objectives, policies and methods.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Amendments to the Definitions of the Taupō District Plan Section 10

Points: 93.25

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Oppose

Insert a new definition of Renewable electricity generation activities (being the same definition in the NPS-REG) as follows:

Renewable electricity generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.

Insert a new definition of reverse sensitivity (being the definition in the Waikato RPS) as follows:

Reverse sensitivity is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.

Include reason(s) for your submission point

Due to the nature of the following submissions by Contact, two additional definitions need to be included in the Taupō District Plan.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.1 Introduction

Points: 93.26

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend the Introduction to Chapter 3b.1 as follows:

3b.1 Introduction

The Rural Environment makes up most of the land within the District and has been categorised into two distinct areas, being the General Rural Environment and the Rural Lifestyle Environment. These separate areas highlight the increasing need to protect the open space characteristics of the Rural Environment and its production values, while also providing for the growth of the District and the demand for rural lifestyle living in specific locations. The Rural Environment also contains sites that are of significance, some of these are identified as Outstanding Landscape Areas. The Rural Environment objectives and policies seek to manage subdivision and land use activities in a way that reflects the productive nature of the land, the rural level of infrastructural services and the amenity values of the landscape, as well as managing effects and enabling rural lifestyle living in appropriate areas. Other activities that are anticipated in the Rural Environment are tourism activities, visitor accommodation and renewable electricity generation and transmission. It is important that all such activities do not affect the ability of the rural environment to function effectively. It is also important to acknowledge that existing, lawfully established activities in the Rural Environment are able to continue operating and that activities that choose to locate in close proximity to these activities are aware of the effects they can generate and that the Rural Environment is the best location for these activities. It is expected in the Rural Environment that all properties are self-servicing in terms of the provision of potable water and the disposal of stormwater and wastewater.

The papakāinga provisions recognise the intent of Part 2 of the RMA and provide for the occupation by whanau, hapū or iwi members on Māori land. The provisions recognise the importance of enabling Māori to settle on their ancestral lands. Papakāinga development will often be at higher densities than other residential land uses in the rural environment. Papakāinga may also have associated social, cultural or commercial aspects to support the community who reside there.

In addition to papakāinga there is a wide range of cultural activities and activities of importance to Māori which are appropriate to occur within the rural environment.

General Rural Environment

The General Rural Environment is predominantly characterised by large open space and vegetated areas including productive farmland and forest, ridgelines, native bush, lakes, rivers and their margins. Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy sources and plantation forestry activities, with dispersed buildings and rural roads. There is also a wide range of development associated with tourism activities, recreation, and the District is one of New Zealand's most significant for the generation, storage and transmission of renewable electricity.

The purpose of separating the General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land and other natural resources within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for, ~~Yet~~ allowing appropriate development to occur while preserving the rural character 'openness' of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, renewable electricity generation activities, and rural industry, meaning an activity being activities that directly supports, services, or is are dependent on primary production and/or has a locational or functional need to be within the General Rural Environment (rather than an urban environment).

Primary production a Activities in the General Rural Environment will produce effects that are different from urban areas, such as noise, odour, vibration, spray drift and dust. Allowing these activities to operate in a more suitable environment, along with compatible activities, aims to protect rural land uses from unnecessary restrictions. The General Rural Environment provisions seek to limit the scale of commercial and industrial activities unless they are dependent on primary production and/or have a locational functional or operational need to be within the General Rural Environment. This is to avoid the uptake of General Rural Environment land by activities which are provided for in other Environments and may therefore impact on the land available for primary production activities within the General Rural Environment.

Rural Lifestyle Environment

The Rural Lifestyle Environment has been created to address the increasing demand for rural lifestyle living within the Rural Environment. The Rural Lifestyle Environment aims to provide for rural residential development in specific locations for those who want the benefits of rural living without necessarily undertaking a productive rural activity. By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property sizes, whilst retaining separation from the rural production and other activities predominating in the General Rural Environment. This separation of activities serves to minimise reverse sensitivity issues. By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics rural character and the productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.

The Rural Lifestyle Environment will be less populated than a Residential Environment, with standards in place for minimum lot sizes to preserve the rural residential aspect of the area. Limited provision is also made for home business and commercial activity to occur, but not of a scale or extent that changes the predominantly rural residential amenity and character intended. The Rural Lifestyle Environment areas are located closer in proximity to urban areas to allow for access to community facilities within the district's townships.

Include reason(s) for your submission point

The introductory statement to Chapter 3b provides context about the nature and character of the District's rural environment, and the activities that are anticipated to occur within it.

Contact generally supports the introductory statement but seeks minor changes to recognise the importance and functional need for renewable electricity generation to occur within the Rural Environment, its contribution to **the regional economy and New Zealand's security of electricity supply**.

These changes also reflect the need to ensure that renewable electricity generation activities are protected from potential reverse sensitivity effects (such as housing, visitor accommodation and lifestyle development both within the General Rural Environment and the new Rural Lifestyle Environment), and that if sensitive and incompatible activities do establish, they do not constrain the ability of renewable electricity generation activities to continue operating efficiently and effectively.

Contact supports the statement about creating Rural Lifestyle Environments "*in appropriate locations within the Rural Environment*".

Contact also supports the statement: "*By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics and productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.*".

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.1 Enable Primary Production **Points: 93.27**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Retain Objective 3b.2.1.

Objective 3b.2.1 Enable Primary Production **and the Use of Natural Resources**

Primary production and the use of natural resources are is enabled by protecting the availability of the rural land and other resources s and its their productive capability.

Include reason(s) for your submission point

Contact supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just “primary production”.

In accordance with s75(3) of the RMA District objectives and policies must give effect to existing RPS objectives and policies. Objective IM-02 in the Waikato RPS is ‘Resource Use and Development’. One of the policies which achieves Objective IM-02 is IM-P4 ‘Regionally Significant Industry and Primary Production’. The suggested amendments give effect to the Waikato RPS.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.2 Maintaining the established General Rural character

Points: 93.28

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Oppose

Amend Objective 3b.2.2 to read:

Objective 3b.2.2 ~~Maintaining the established General~~ Rural character

~~The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.~~

Enable a range of activities in the General Rural Environment that are compatible with rural character.

Include reason(s) for your submission point

Contact is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, an objective that seeks to maintain the “established character” is essentially seeking no change. The objective seeks to avoid “incremental subdivision and development” which essentially locks in the status quo and will make it difficult for any new development to occur, including new development that has been identified in other planning provision as being appropriately located in the General Rural Environment.

As an example, a new geothermal power station will definitely change the character of the part of the General Rural Environment in which it is proposed and ultimately constructed which is an outcome contrary to Objective 3b.2.1. The same applies for other forms of development such as the construction and operation of a dairy shed.

The wording of some of the existing planning provisions in the Rural Environment have been proposed as alternative wording for Objective 3b.2.2.

The relief sought focuses on the use of “rural character” which scope of activities, affect and structure are outlined in Policy 3.b.2.9.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.3 Rural industry

Points: 93.29

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Retain Objective 3b.2.3.

Inset a new objective following Objective 3b.2.3 as follows:

Objective 3b.2.X Renewable Electricity Generation and Transmission Activities

Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.

Include reason(s) for your submission point

Due to its elevated status under the NPS-REG, Contact has sought (above) that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be including in the Plan. In line with that outcome, a new objective needs to be included in the Plan seeking to enable renewable electricity generation activities (and transmission activities by association).

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.4 Other activities

Points: 93.30

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend Objective 3b.2.4 as follows:

Objective 3b.2.4 Other activities

Māori cultural activities, tourism activities, and visitor accommodation ~~and renewable electricity generation and transmission~~ activities are enabled in appropriate locations within the General Rural Environment.

Include reason(s) for your submission point

As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity generation activities), Objective 3b.2.4 needs to be amended to remove the reference to renewable electricity generation (and transmission by association).

Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather than enabled anywhere including in locations whereby reverse sensitivities could arise.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.5

Avoidance of reverse sensitivity

Points: 93.31

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend Objective 3b.2.5 as follows:

Objective 3b.2.5 Avoidance of reverse sensitivity

Reverse sensitivity effects on permitted, and legally established, and/or consented activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.

Include reason(s) for your submission point

Contact supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Contact is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already *exists*. This is particularly concerning for Contact. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

Contact's geothermal generation activities, which do and are anticipated to occur in the District's General Rural Environment (as identified in the introductory text to this chapter and Strategic Directions chapter).

From time-to-time new wells and pipelines will be required to establish to support the on-going operation of its geothermal generation plants.

This objective and policy framework could allow housing to proliferation of new houses to establish in areas of the rural environment because there are few if any rural production activities operating.

Reverse sensitivity is a key issue for Contact. The introduction of new sensitive activities into the rural environment where rural production and renewable electricity generation exist has the potential to create complaint as the two are incompatible.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.6 Impacts on infrastructure

Points: 93.32

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend Objective 3b.2.6 as follows:

Objective 3b.2.6 Impacts on infrastructure

The impacts ~~on infrastructure~~ arising from subdivision and development ~~are managed~~ do not compromise the safe and efficient functioning of infrastructure.

Include reason(s) for your submission point

An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupō District Plan.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.9 Maintaining the established character

Points: 93.33

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Oppose

Amend Policy 3b.2.9 as follows:

Policy 3b.2.9 ~~Maintaining the established Rural~~ character

Enable activities in the ~~Maintain the established~~ General Rural Environment ~~that will not compromise the character of the General Rural Environment~~, as defined by:

- ~~a) Extensive pastoral farming and forestry~~
- ~~b) Renewable electricity generation activities~~
- ~~c) Geothermal areas and activities, electricity transmission and distribution~~
- ~~ad) Large open spaces between built structures~~
- ~~be) A mix of residential and rural industry buildings~~
- ~~c) Noises related to production activities during the day but low levels of noise at night~~
- ~~d) Low levels of light spill~~
- ~~f) Effects from activities including noise, vibration, dust, odour and visual effects~~
- ~~e) Infrequent vehicle movements to and from a site~~
- ~~fg) Limited signage that directly relates to the activity operating on the site.~~

Include reason(s) for your submission point

Contact opposes Policy 3b.2.9 for the same reasons it opposes Objective 3b.2.2.

Contact is of the view that Policy 3b.2.9 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, a policy that seeks to maintain the “established character” is essentially seeking no change.

The policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 20 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupō District.

Other aspects of the policy just need to be more accurate and not create false expectations.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.10 Residential units
Points: 93.34

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend Policy 3b.2.10 as follows:

Policy 3b.2.10 Residential units

Avoid the cumulative effects of rural lifestyle development by providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment that:

- a) Increase the demand for community infrastructure and services
- b) Result in the inefficient use of land or loss of future flexibility for productive uses
- c) Erode the general rural character through its density, scale and location-
- d) Result in the potential to generate reverse sensitivity effects.
- e) Constrain the ability to access or utilise renewable energy resources.

Include reason(s) for your submission point

Contact supports Policy 3b.2.10 but it needs to be expanding to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.12 Minor residential unit
Points: 93.35

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend Policy 3b.2.12 as follows:

Policy 3b.2.12 Minor residential unit

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a

suitable size, and to ensure that the future availability of the rural land resource will not be compromised and to avoid the potential for reverse sensitivity effects.

Include reason(s) for your submission point

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.13 Avoiding reverse sensitivity **Points: 93.36**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend Policy 3b.2.13 as follows:

Policy 3b.2.13 Avoiding reverse sensitivity

Any adverse effects generated by an new sensitive activity must be managed within the allotment so as to avoid adversely affecting reverse sensitivity effects on permitted, and lawfully established and/or consented neighbouring activities.

Include reason(s) for your submission point

Contact supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects.

Contact seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.14 Commercial and industrial activity **Points: 93.37**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend Policy 3b.2.14 as follows:

Policy 3b.2.14 Commercial and industrial activity

Limit the scale of commercial and industrial activity (excluding renewable electricity generation activities) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production and other activities provided for within the General Rural Environment.

Include reason(s) for your submission point

Because renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities.

Contact supports the intent of the policy but it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.15 Allotment size **Points: 93.38**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain Policy 3b.2.15.

Include reason(s) for your submission point

Contact supports Policy 3b.2.15 on the basis that it reinforces the intension that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities).

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b

Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment **Points: 93.39**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Oppose

Delete Objective 3b.3.1 and replace it with the following:

Objective 3b.3.1 Enable Rural Residential Activities

Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.

Include reason(s) for your submission point

It is assumed that this objective relates to activities within the Rural Lifestyle Environment (if in is intended to control activities in the surrounding General Rural Environment, then the objective in in the wrong section of the Plan).

This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments).

If Rural Lifestyle Environment are proposed in inappropriate locations (and no decision is made to amend that situation), it forces Contact (and other parties) to seek to amend the rules and performance standards within the Rural Lifestyle Environment as an alternative means to avoid the creation of reverse sensitivity effects. It is preferable that only appropriate locations are zoned Rural Lifestyle Environment whereby activities occurring within those zones do not need to be constrained by way of the rules and performance standards.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.2 Avoid reverse sensitivity **Points: 93.40**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend Objective 3b.3.2 as follows:

Objective 3b.3.2 Avoid reverse sensitivity

Adverse reverse sensitivity effects, ~~including conflict with on~~ permitted, ~~and~~ legally established and/or consented activities in neighbouring Environments, are avoided.

Include reason(s) for your submission point

Contact supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Contact is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already *exists*. This is particularly concerning for Contact. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

Contact's geothermal generation activities, which do and are anticipated to occur in the District's General Rural Environment (as identified in the introductory text to this chapter and Strategic Directions chapter). From time-to-time new wells and pipelines will be required to establish to support the on-going operation of its geothermal generation plants.

This objective and policy framework could allow housing to proliferation of new houses to establish in areas of the rural environment because there are few if any rural production activities operating.

Reverse sensitivity is a key issue for Contact. The introduction of new sensitive activities into the rural environment where rural production and renewable electricity generation exist has the potential to create complaint as the two are incompatible.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.3 Commercial and industrial activities **Points: 93.41**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend Objective 3b.3.3 as follows:

Objective 3b.3.3 Commercial and industrial activities

The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the Rural Lifestyle Environment are avoided.

Include reason(s) for your submission point

Contact supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.4 Consolidate rural lifestyle activities

Points: 93.42

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain Objective 3b.3.4.

Include reason(s) for your submission point

Contact supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.6 Impacts on community infrastructure

Points: 93.43

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Oppose

Amend Objective 3b.3.6 as follows:

Objective 3b.2.6 Impacts on community infrastructure

The impacts ~~on community infrastructure~~ arising from subdivision and development ~~are managed~~ do not compromise the safe and efficient functioning of infrastructure.

Include reason(s) for your submission point

An objective (or policy) that only seeks to “manage” something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupō District Plan.

The objective should apply to all infrastructure, not just community infrastructure.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Policy 3b.3.9 Character of the Rural Lifestyle Environment

Points: 93.44

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Add a new point i) to Policy 3b.3.9 as follows:

i) An environment that is surrounded by a working rural environment including rural production, geothermal areas and renewable electricity generation activities.

Include reason(s) for your submission point

Contact supports Policy 3b.3.9 but it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment

Points: 93.45

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain Policy 3b.3.10.

Include reason(s) for your submission point

Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing reverse sensitivity effects. Contact therefore supports this policy on this basis.

However, Contact reiterates that these two measures alone will not always avoid the potential for reverse sensitivity effects (which is what new Objective 3b.3.2 requires), and this needs to be reflected across several policies within this sub-chapter. See the relief sought in relation to other objectives and policies.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Policy 3b.3.12 Minor residential unit

Points: 93.46

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend Policy 3b.3.12 as follows:

Policy 3b.3.12 Minor residential unit

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, ~~and~~ to further protect the character of the ~~r~~Rural Lifestyle Environment ~~and to avoid reverse sensitivity effects.~~

Include reason(s) for your submission point

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.1 Activities in the General Rural Environment

Points: 93.47

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain Rule 4b.1.1.

Include reason(s) for your submission point

Contact supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.2 Minor residential units

Points: 93.48

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Amend Rule 4b.1.2 as follows:

- i. A minor residential unit which complies with the performance standards is a **permitted activity**.
- ii. A minor residential unit which does not comply with the performance standards is a **restricted discretionary activity**.

When considering activities under Rule 4b.1.2 Council restricts the exercise of its discretion to the following matters:

- a. The proximity between the primary residential unit and the minor residential unit.
- b. The extent to which the residential unit and vehicle access point design, siting and external appearance adversely affects rural character and amenity.
- c. Site topography and orientation and whether the residential unit(s) and vehicle access point can be more

appropriately located to minimise adverse visual amenity effects.

d. Effect on nearby sites, including outlook and privacy.

e. Whether the residential unit and the vehicle access point can be more appropriately located to maintain, enhance or restore indigenous biodiversity values.

f. The ability to **mitigate avoid** adverse effects, **including reverse sensitivity effects**, through the use of screening, planting, landscaping, **and** alternative design, **and/or other means including restrictive covenants**.

g. Proposed methods for the avoidance, remedying or mitigation of potential adverse effects, and the degree to which they would be successful

h. The likelihood of future subdivision which results in the minor residential unit being on a separate allotment to the primary residential unit.

i. The potential to constrain access to and/or the utilisation of renewable energy sources.

Include reason(s) for your submission point

Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects.

An additional criterion has been added to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.3 Temporary Activities **Points: 93.49**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Support

Retain Rule 4b.1.3.

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields **Points: 93.50**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Support

Amend Rule 4b.1.4 as follows:

4b.1.4 Electricity Generation Core Sites, Renewable **Electricity Energy** Generation Activities and Geothermal **Areas Steamfields**

i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal **areas steamfields**, renewable **energy electricity** generation activities and associated structures **and ancillary activities** is a **permitted activity**.

ii. **Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.**

NOTE: For the purpose of this rule “maintenance” means:

All activities associated with the protective care, **and** monitoring **of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor**, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation **of all associated structures** and includes maintenance of surrounds and water areas.

NOTE: For the purpose of this rule “minor upgrading” means:

Structural improvement, repair and replacement **or upgrade** of **components, or activities required for the continued safe and efficient operation** including worn or technically deficient parts of **any structure including** the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures **of similar character and scale**, and includes associated drilling, **vehicles, infrastructure, machinery**, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures **up to 100m² in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.**

Include reason(s) for your submission point

Contact supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for the operation,

maintenance and minor upgrading renewable electricity generation activities in the General Rural Environment.

The term “Geothermal Areas” has been used rather than “Geothermal Steamfields” due to Section O of the Plan identifying and mapping Geothermal Areas.

A second clause has been added to the rule on the basis that Policy G of NPS-REG states:

“Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.”

Activities of this nature tend to be temporary activity and any effects are easily remediated.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.5 Commercial and industrial activities, and home businesses, **Points: 93.51**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend Rule 4b.1.5 as follows:

- i. A commercial, industrial activity or home business which complies with the performance standards is a **permitted activity**.
- ii. A commercial, industrial activity or home business which does not comply with the performance standards is a **restricted discretionary activity**.

When considering activities under Rule 4b.1.5ii Council restricts the exercise of its discretion to the following matters:

- a. The daily vehicle movements expected to and from the allotment.
- b. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.
- c. The effect of the activity on surrounding land uses (including reverse sensitivity effects) and how these effects can be managed onsite and/or mitigated.
- d. The hours of operation for the activity.
- e. The proposed signage associated with the activity.

Include reason(s) for your submission point

A typo needs to be corrected – The third paragraph should refer to Rule 4b.1.5ii.

Home businesses could include sensitive activities and need to avoid creating reverse sensitivity effects.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.7 High voltage transmission lines **Points: 93.52**

What decision are you seeking from the Council? What action would you like: Retain?
Delete? Amend?
Support

Amend Rule 4b.1.7 as follows:

4b.1.7 Buildings and Structures in proximity to High voltage transmission lines

- i. Any building or structure (except network utilities and Renewable Electricity Generation Activities) located within 0 – 12 meters of a high-voltage transmission line is a **restricted discretionary activity**.

Include reason(s) for your submission point

Contact supports this rule as it seeks to ensure the safe operation of transmission lines. However, the heading of the rule needs to be more accurate.

In addition to network utilities, this rule should also provide an exception for renewable electricity generation activities (which are not necessarily network utilities).

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.8 Buildings within Outstanding Landscape Areas **Points: 93.53**

**What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support**

Retain Rule 4b.1.8 but amend the first exception to the rule as follows:

EXCEPTION: This rule will not apply to the erection of structures:

- a. Associated with existing renewable electricity generation activities including ~~W~~within Electricity Generation Core Sites.
- b. ...

Include reason(s) for your submission point

Contact supports this rule on the basis that it does not apply to buildings within Electricity Generation Core Sites, but there is no reason why it should not apply to all other existing renewable electricity generation activities.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.9 Earthworks within Outstanding Landscape Areas **Points: 93.54**

**What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support**

Retain 4b.1.9 but amend the exception as follows:

EXCEPTION:

This rule will not apply to Earthworks associated with existing and/or consented renewable electricity generation activities including within Electricity Generation Core Sites.

Include reason(s) for your submission point

Contact supports this rule on the basis that it does not apply to earthworks within Electricity Generation Core Sites, but there is no reason why it should not apply to all other existing renewable electricity generation activities.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.1 Vehicle movements **Points: 93.55**

**What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment**

Retain 4b.2.1 but amend the exception as follows:

EXCEPTION:

This performance standard shall not apply to traffic movements involved in forest harvesting operations or existing and consented renewable electricity generation activities.

Include reason(s) for your submission point

Contact supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.5 Maximum building height **Points: 93.56**

**What decision are you seeking from the Council? What action would you like: Retain?
Delete? Amend?
Seek amendment**

Amend Rule 4b.2.5 as follows:

4b.2.5 Maximum building height

- i. 12 metres.
- ii. 5 meters in a height restricted area.

iii. 5 meters in an Outstanding Landscape Area.

iv. 15 meters for ~~renewable Electricity~~ ~~Generation~~ ~~activities~~ on land identified as a Geothermal Area in Section O ~~within an Electricity Generation Core Site~~.

EXCEPTIONS:

- ~~activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators including wind monitoring masts – no height limit~~
- Cranes being used as part of any construction or maintenance works for the duration of the works – no height limit.
- Drilling Rigs for up to 60 days per well ~~allotment~~ – no height limit.

Include reason(s) for your submission point

Contact seeks amendments to Rule 4b.2.5 to make the rule applicable to all renewable electricity generation activities within Geothermal Areas.

An additional exception has been added to the rule on the basis that Policy G of NPS-REG states:

“Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.”

Activities if this nature tend to be temporary activity and any effects are easily remediated.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.6 Minimum building setbacks

Points: 93.57

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Seek amendment

Amend Rule 4b.2.6 as follows:

4b.2.6 Minimum building setbacks

i. 30 metre setback for dwellings and minor residential units from the front boundary.

ii. 15 metres from all other boundaries

iii. 25 metres in Outstanding Landscape Areas from all boundaries.

iv. 200 metres for buildings for the management of farmed animals from all boundaries.

v. There shall be no front boundary setback for buildings and activities associated with ~~Electricity Generation and Renewable Energy~~ ~~Electricity~~ Generation Activities on land identified as Geothermal Area in Section O ~~within an Electricity Generation Core Site~~ where the road extends over any power generation Building or Structure.

vi. There shall be no boundary setback for buildings and activities associated with ~~Renewable~~ Electricity Generation ~~Activities~~ on land identified as Geothermal Area in Section O ~~including~~ within an Electricity Generation Core Site

EXCEPTION:

For the purpose of this performance standard water tanks are not required to comply with the setback requirements in this standard.

Include reason(s) for your submission point

Contact seeks minor amendments to Rule 4b.2.6 to make it more accurate and workable.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.7 Minor residential units

Points: 93.58

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Seek amendment

Amend Rule 4b.2.7 as follows:

4b.2.7 Minor residential units

A maximum of one minor residential unit per primary residential unit per allotment.

i. All minor residential ~~units~~ or accommodation activity units shall:

- a. Be no larger than 100m² in size
- b. Be located no greater than 20 metres from the primary residential unit.
- c. Be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more than 300m away from any aforementioned Consent Area.
- d. Share an accessway/driveway with the primary residential unit.

EXCEPTION:

Papakāinga

NOTE:

Minor residential units also include accommodation activities, tiny homes/houses, caravans and other structures used for accommodation for more than two consecutive months in a calendar year on the allotment.

Include reason(s) for your submission point

Minor residential units need to be located so that they do not create additional restrictions on renewable electricity generation activities by, for example, moving a point of noise compliance closer to the source of noise.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.8 Commercial and industrial activities, and home businesses **Points: 93.59**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend Rule 4b.2.8 as follows:

4b.2.8 Commercial and industrial activities, and home businesses

- i. Any indoor or outdoor space used for commercial, industrial or home business purposes, shall have a gross floor area less than 100m² for indoor activities, or 100m² of land area for outdoor activities.
- ii. For home businesses the principal operator of the home business must be a permanent resident on the site to which the home business relates.

iii. Home businesses shall be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more than 300m away from any aforementioned Consent Area.

EXCEPTION:

Home business or commercial activities within a Papakāinga.

Include reason(s) for your submission point

Home businesses need to be located so that they do not create additional restrictions on renewable electricity generation activities.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.9 Maximum Noise - Limits **Points: 93.60**

What decision are you seeking from the Council? What action would you like: Retain?
Delete? Amend?
Support

Retain

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.10 Maximum Noise - Construction Noise **Points: 93.61**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.11 Maximum Noise - Electricity Generation Core Sites

Points: 93.62

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.12 Maximum Noise - Well Drilling and Testing

Points: 93.63

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.13 Maximum Noise - Other

Points: 93.64

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Delete? Amend?
Seek amendment

Amend Rule 4b.2.13 as follows:

4b.2.13 Maximum Noise – Other

i. Nothing in the foregoing Performance Standards shall apply to farm animals including working dogs, and to agricultural and forestry vehicles, agricultural and forestry machinery or equipment (including mobile plant at produce packing facilities but excluding sawmilling equipment), operated and maintained in accordance with the manufacturer's specifications in accordance with accepted management practices (e.g. for milking, spraying, harvesting, packing, forest harvesting and the like). Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991

ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, bursting discs, emergency or upset operating conditions and hydro spills associated with the operation of Renewable Electricity Generation Activities Core sites. Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.

Include reason(s) for your submission point

Contact supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.14 Parking, Loading and Access

Points: 93.65

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Delete? Amend?
Oppose

Delete Rule 4b.2.14.

Include reason(s) for your submission point

Taupo District is a Tier 3 territorial authority. The NPS-UD sets out that tier 1, 2 and 3 territorial authorities must remove district plan rules, assessment criteria, policies and objectives that have the effect of setting minimum car parking rates as soon as practicable, no more than 18 months from the date of commencement of the NPS-UD.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.15 Signage **Points: 93.66**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Support

Retain Rule 4b.2.15.

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.1 Subdivision - General Rural Environment **Points: 93.67**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Support

Retain Rule 4b.5.1 subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).

Include reason(s) for your submission point

Contact supports this rule subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment **Points: 93.68**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Support

Retain Rule 4b.5.2 subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).

Include reason(s) for your submission point

Contact supports this rule subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment **Points: 93.69**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend? Seek amendment

Amend Rule 4b.5.3 as follows:

4b.5.3 Subdivision – Rural Lifestyle Environment that does not adjoin the General Rural Environment

- i. Subdivision resulting in lots that are 2 hectares or larger that do not adjoin the General Rural Environment is a **controlled activity**.
- ii. Subdivision resulting in lots that are smaller than 2 hectares that do not adjoin the General Rural Environment is a **non-complying activity**.

For the purposes of Rules 4b.5.1.i, 4b.5.2.i and 4b.5.3.i the matters over which the Council reserves control for the purpose of assessment are:

- a) The design and layout of the subdivision to ensure safe and efficient access onto existing and/or proposed roads, multi-modal connectivity if appropriate, suitable building platforms to accommodate future complying buildings, and adequate management of stormwater.
- b) The identification of any natural hazards or contaminated sites and how these may affect the stability of the land and suitability of any future building sites, including any information provided by a suitably qualified person whose investigations are supplied with the subdivision application.

- c) Whether the desired environmental outcome with a consistent and appropriate standard of infrastructure is achieved such as through compliance with the Council's Development Guidelines and Structure Plans.
- d) The extent to which earthworks and vegetation removal is required to create vehicle tracks and building platforms.
- e) Any actual or potential effects on areas or features of cultural, historic, landscape or natural value as identified in the plan.
- f) The imposition of conditions in accordance with Sections 108 and 220 of the Resource Management Act 1991.
- g) Any potential adverse effects from Natural Hazards, including flood inundation or erosion from the District's waterways and Lakes.
- h) Any immediate adverse or potentially adverse effects, including cumulative effects, on the amenity and landscape values of the Rural Environment, and the methods by which such effects can be remedied or mitigated.
- i) [Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.](#)

Include reason(s) for your submission point

Contact supports this rule with the inclusion of an additional matter over which control is reserved for controlled activities.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.4 Subdivision - Default Activity Status **Points: 93.70**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain Rule 4b.5.4.

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.5 Subdivision resulting in a new public road, or extension of existing public road **Points: 93.71**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain Rule 4b.5.5.

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.6 Subdivision - Other **Points: 93.72**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain Rule 4b.5.6

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.7 Subdivision - Outstanding Landscape Areas **Points: 93.73**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain Rule 4b.5.7.

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.8 Subdivision - Bonus Lots **Points: 93.74**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain Rule 4b.5.8.

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.9 Subdivision - More than 12 allotments **Points: 93.75**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain Rule 4b.5.9.

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Planning Maps **Points: 93.76**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Oppose

Delete the proposed Rural Lifestyle Environment on Centennial Drive as shown on Figure 1 (attached / presented below) and retain the current Rural Environment (General Rural Environment).



Figure 1: Centennial Drive Proposed Rural Lifestyle Environment

Delete the parts of the proposed Rural Lifestyle Environment on Oruanui Road outlined in red as shown on Figure 2 (attached / presented below) and retain the current Rural Environment (General Rural Environment).



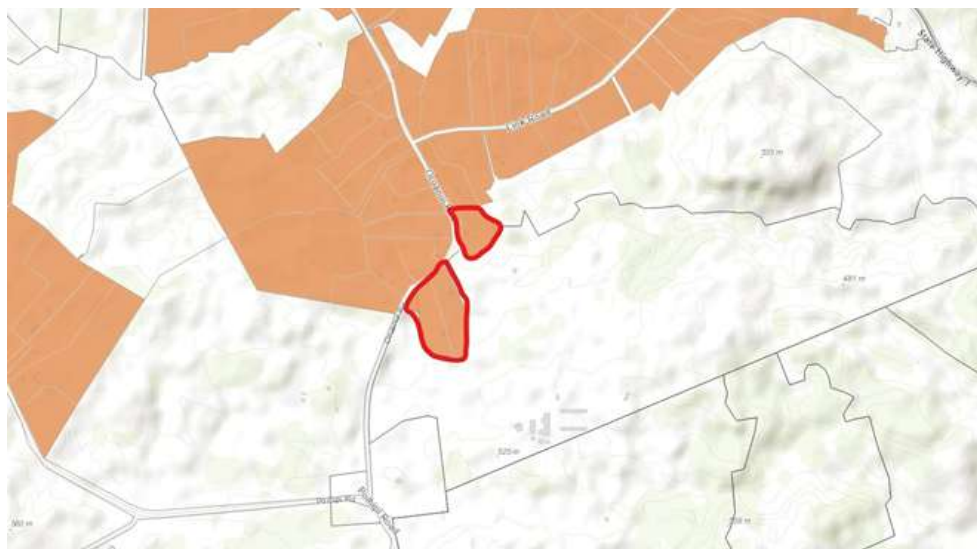


Figure 2: Oruanui Road Proposed Rural Lifestyle Environment

Delete the part of the proposed Rural Lifestyle Environment on Napier Road outlined in red as shown on Figure 3 (attached / presented below) and retain the current Rural Environment (General Rural Environment).



Figure 3: Napier Road (Bonshaw Park) Proposed Rural Lifestyle Environment

Delete the parts of the proposed Rural Lifestyle Environment on Tukairangi Road outlined in red as shown on Figure 4 (attached / presented below) and retain the current Rural Environment (General Rural Environment).





Figure 4: Tukairangi Road Proposed Rural Lifestyle Environment

Include reason(s) for your submission point

Contact opposes the rezoning of land on Centennial Drive to Rural Lifestyle Environment.

Existing land use character is a relevant factor when determining land use zoning, but it is not necessarily determinative of the outcome. There are a range other factors that need to be taken into account.

The separation of incompatible land use activities is one of the most fundamental principles of sound planning and resource management practice. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment (and planned future development including that which will be facilitated by the existing and planned future zoning pattern in the area). This includes large scale heavy industrial activities (including an expansion of the Centennial Industrial Environment), geothermal steamfield activities, electricity generation, a motorsport park, horse racing track and an aerodrome.

The Centennial Drive area is vitally important for enabling large scale industrial activities, noisy recreationally activities, and the utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes (the latter being a matter of national significance as recognised in the NPS for Renewable Electricity Generation). This area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities.

If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to address the potential for reverse sensitivity effects to arise.

Contact opposes the rezoning of parts of the land on Oruanui Road to Rural Lifestyle Environment.

Existing land use character is a relevant factor when determining land use zoning, but it is not necessarily determinative of the outcome. There are a range other factors that need to be taken into account.

The separation of incompatible land use activities is one of the most fundamental principles of sound planning and resource management practice. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment to the south which includes Te Mihi Power Station and associated steamfield activities.

Additional wells are planning to be drilled in the area to the north of Te Mihi Power Station in accordance with resource consents held by Contact.

The utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes is a matter of national significance as recognised in the NPS for Renewable Electricity Generation. This area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities.

If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to address the potential for reverse sensitivity effects to arise.

Contact opposes the rezoning of part of the land on Napier Road (known as Bonshaw Park) to Rural Lifestyle Environment. Specifically, Contact opposes the additional 'leg' of land extending to the west of Bonshaw Park along the Napier Road frontage. Contact recognised the 'sensitive' nature of Bonshaw Park as part of consenting the Tauhara Geothermal Development. The outcome includes a 100m setback from Bonshaw Park for surface activities undertaken by Contact. The additional leg of land would provide the ability for additional sensitive land uses to establish in closer proximity to areas which Contact holds resource consents (and land access rights) to undertake steamfield activities. This would constraint Contact's ability to exercise its resource consents and could limit the optimal utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes.

The utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes is a matter of national significance as recognised in the NPS for Renewable Electricity Generation. This area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities.

If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to address the potential for reverse sensitivity effects to arise.

Contact opposes the rezoning of part of the land on Tukairangi Road to Rural Lifestyle Environment.

Existing land use character is a relevant factor when determining land use zoning, but it is not necessarily

determinative of the outcome. There are a range other factors that need to be taken into account.

The separation of incompatible land use activities is one of the most fundamental principles of sound planning and resource management practice. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment to the north and east which includes Poihipi Power Station and associated steamfield activities.

The utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes is a matter of national significance as recognised in the NPS for Renewable Electricity Generation. This area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities.

If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to address the potential for reverse sensitivity effects to arise.

Provision: Plan Change 43 - Taupō Industrial Zone

Points: 93.77

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Contact seeks that Taupō District Council adopt PC43 as notified insofar as it relates to the 3.5 hectare block of land on the corner of Napier Road and the ETA, i.e. rezone it to Taupō Industrial Environment.

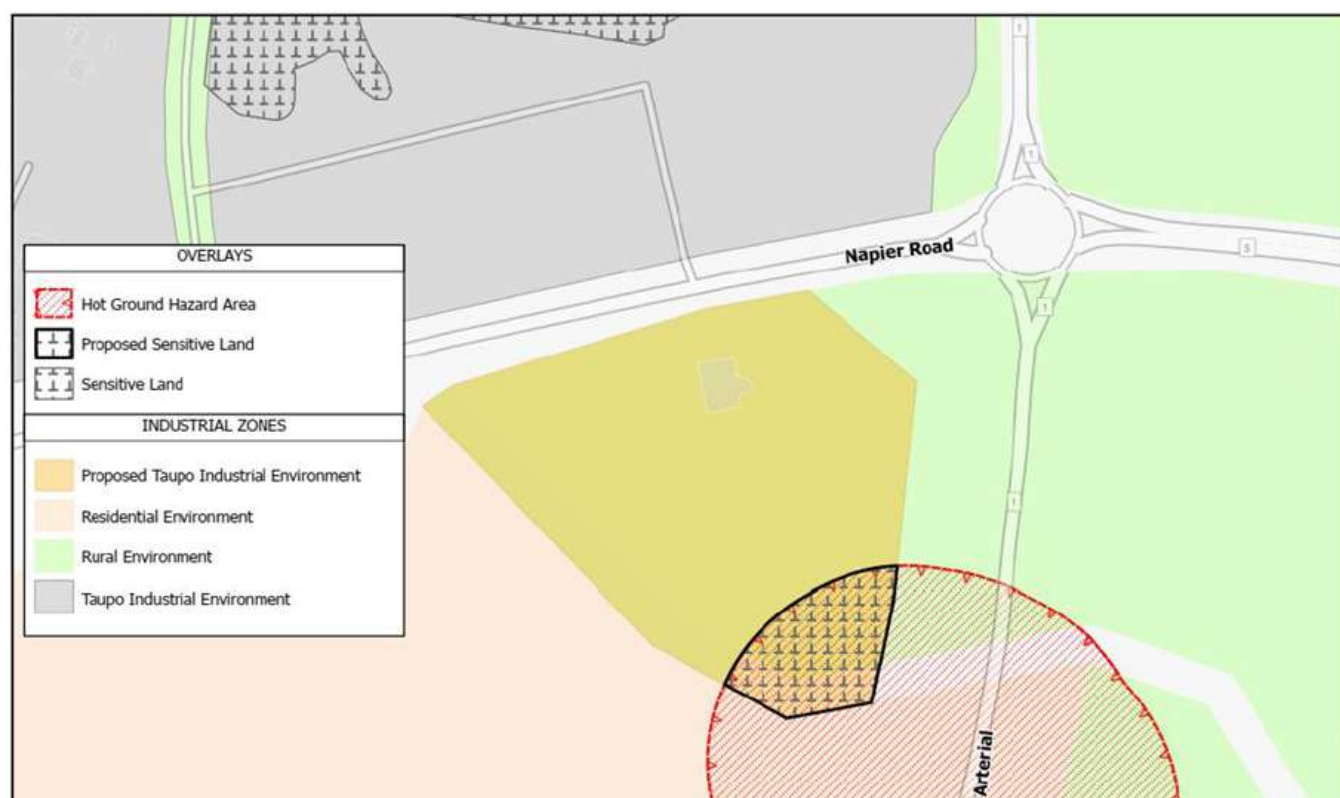
Contact seeks that its land on Broadlands Road not be rezoned to Taupō Industrial Environment and instead retain the current Rural Environment zoning.

Include reason(s) for your submission point

Contact supports PC43 in part and opposes it in part.

Napier Road Area

Contact supports the proposed rezoning of the 3.5 hectare block of land on the corner of Napier Road and the East Taupō Arterial (ETA) to Taupō Industrial Environment as shown on the plan below.

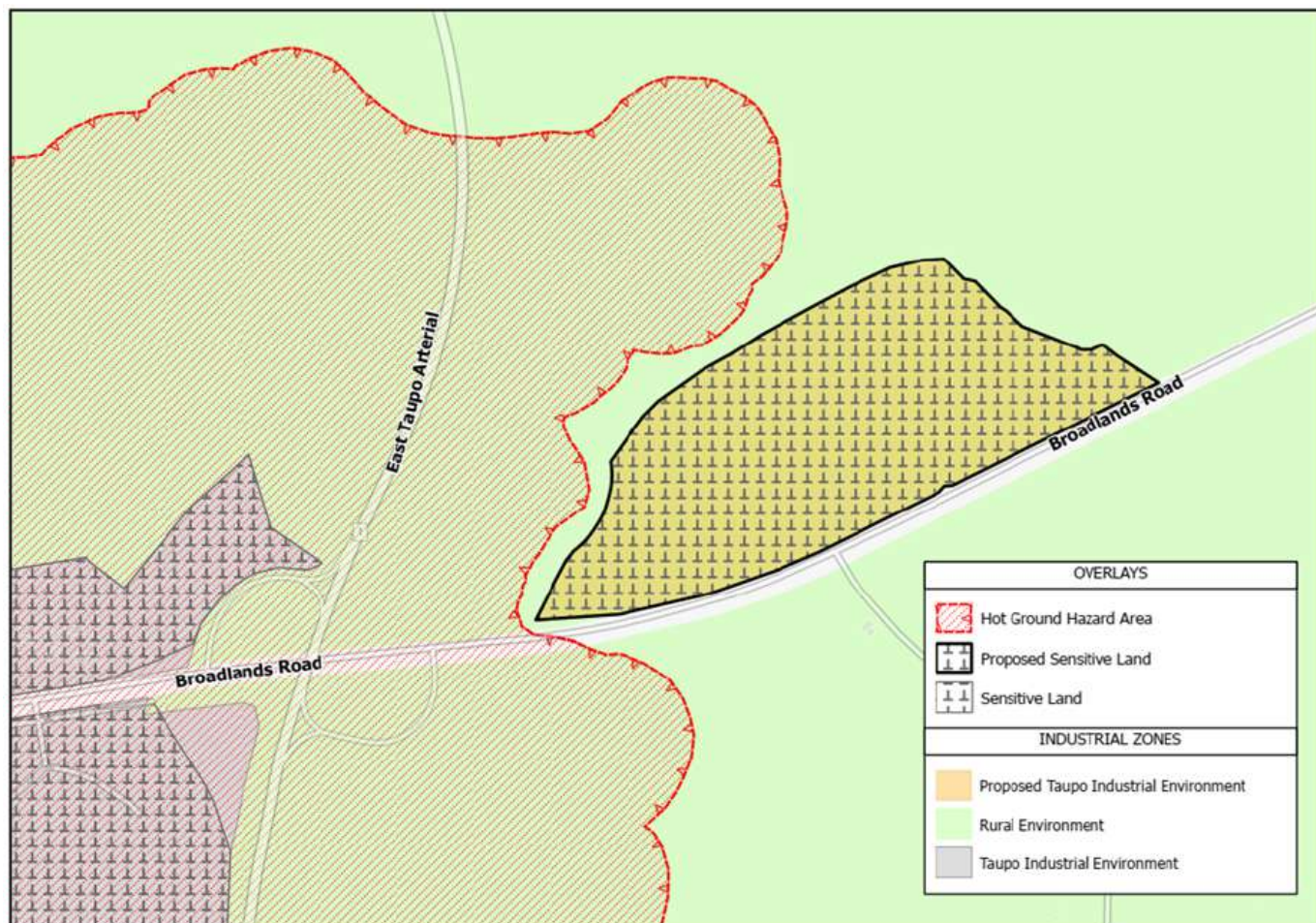




The current Rural Environment zoning of this land on the Taupō township side of the ETA is somewhat of an historical anomaly. An industrial zoning of this site is compatible with the surrounding environment including the land on the opposite side of Napier Road and Contact's Tauhara Geothermal Development Consent Area on the opposite side of the ETA.

Broadlands Road Area

The second area proposed to be rezoned as Taupō Industrial Environment as part of PC43 is on Broadlands Road to the east of the ETA as shown on the following plan.



The eastern half (approximately) of this area is land owned by Contact. It is unclear as to why Taupō District Council is proposing to rezone Contact's land in this locality to Taupō Industrial Environment.

Contact has previously advised Taupō District Council that it has no intention to develop (or allow others to develop) this part of its property for industrial purposes (at least in the foreseeable future). Contact is concerned that rezoning this land might create false expectations and the outcome will not assist Taupō District Council meet its obligations under the National Policy Statement on Urban Development 2020.

Attached Documents

File

No records to display.



First name: Jane
Last name: Penton

On behalf of:
LWAG

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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
LWAG submission draft District Plan changes December 2022

Lakes & Waterways Action Group Trust submission to the draft District Plan changes 38-43

5th December, 2022

Lakes and Waterways Action Group Trust would like to thank the Council for the opportunity to comment on the draft District Plan changes.

RE: STRATEGIC DIRECTIONS

- LWAG support '2.2 STRATEGIC DIRECTION 2 FRESHWATER QUALITY / TE MANA O TE WAI'

As with past submissions on water quality and quantity LWAG have sought that LID principles be incorporated into subdivision and land use change. We have seen considerable advances in their inclusion in local greenfield developments.

However potable water is an expensive resource for this community and our per capita water use remains high compared to other districts. While understanding government changes to water supply are pending, LWAG are concerned that TDC has not included specific planning provisions relating to rainwater collection - either retrofitting or for new builds.

When requesting the specifications for the Waiora House build at the last Annual Plan submission round we received this information as part of the list of sustainability principles incorporated into the design:

'Rainwater harvesting system – With hot dry summers, and a large external area to maintain, we have designed a rainwater harvesting system to feed the irrigation of the site, as well as the toilet facilities – so these do not draw on the mains water supply. A 30,000-litre water tank will capture over half the roof area and provide ample irrigation and plumbing to those linked services.'

- LWAG ask that Strategic Directions include provision for all new builds to incorporate rainwater harvesting systems designs to use water for on-site irrigation and toilet facilities (as per above).
- LWAG support the inclusion of 2.4 Strategic Direction 4 Climate Change including the proviso that: *'The Strategic Directions for climate change are consistent with the Government's obligations to achieve net zero carbon emissions by 2050 and accords with the target for 100% renewable electricity generation by 2030.'*

However, LWAG ask how this translates into the DP changes 38-43?

We note for instance that, PC 40 relating to Taupō Town Centre Precincts does not include objectives or policy relating to '2.4 STRATEGIC DIRECTION 4. CLIMATE CHANGE 3. Urban and built development must be designed in a manner which considers the need to reduce greenhouse gas emissions associated with that development and resulting land use'

- LWAG seek an objective be included to this effect

- LWAG ask that clarity be provided on how reduction of greenhouse gas emissions will be measured and monitored for the planning, implementation and outcome of built development

REF: 2.4 STRATEGIC DIRECTION 4 CLIMATE CHANGE

- LWAG wholly support the inclusion of Climate change as strategic Direction 4 for the Taupō District Plan.

Comment: We understand that Strategic Direction 4. Likely relates to the newly adopted Emissions Reduction Targets & Directives. However, we feel that further detail would be helpful in the DP Strategic Direction and specific Chapters under review.

Re: 2.4.2 *Objective 1. Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes.*

- As per above we ask that direction is given clarifying how how greenhouse gas emission budgets will be incorporated into a change of land use or for new developments in the urban area and Taupo Town Centre .

Re: Plan Change 40 Taupo Town Centre

As per our previous comments: Taupo is traditionally a low-rise urban landscape which is valued, we believe, by both residents and visitors. We are concerned with the adverse amenity effects of 4-story buildings on the lakeshore and their visual impact in the newly upgraded lakefront area (Robert St/Lake Tce). Also, the visual amenity from the Lake itself will be adversely affected by this development.

- LWAG ask that any multi-story buildings be limited to a zone at least two blocks back from the road/lakefront in the Taupo Town Centre.

We note that provisions for increased building heights mean more people living/working/staying in the Town Centre.

- Ref: 4.g.1 Performance Standards '*ADDITIONAL PERFORMANCE STANDARDS FOR THE PEDESTRIAN PRECINCT*' LWAG ask that this include performance standard for the provision for secure multi-use active transport parking (Ebikes, bikes, scooters etc)

Revegetation of the Taupo Town Centre is effective in reducing greenhouse gases and has a positive effect on our wellbeing. Allowing increased height in the Town Centre should require provisions for increased vegetation. LWAG ask how this is being encouraged in the Town Centre?

- We seek provisions for tree planting/vegetation, and the encouragement of incorporating vertical gardens/rooftop gardens into building design to be included in performance standards in the Taupō Town Centre environment.
- LWAG ask that performance standards include provision for all new builds to incorporate rainwater harvesting systems designs (as per above).

RE: PLAN CHANGE 42 - GENERAL RURAL ENVIRONMENT & RURAL LIFESTYLE ENVIRONMENT

Plan Change 42- General Rural & Rural Lifestyle Environments:

In general the TCAG supports residential development close to town to minimise travel (Greenhouse gas emissions) and pressure on infrastructure including water supply in a climate stressed world. We understand this preference is in line with TDC 's latest Growth Management Strategy.

Ideally rural residential areas would be adjacent to residential developments, for instance a variety of lot sizes in the Nukahau Plan Change would have provided for this. Public transport and active transport can be facilitated close to urban areas in the District.

While we support the Rural Lifestyle rezoning in principle, we are concerned that allowing further subdivision in these areas will increase carbon emissions as there will be increased travel.

Allowing increased vehicle movements from intensified Rural Lifestyle zone does not fit with Strategic Direction 1. *'Subdivision, use and development of land in the Taupo District will result in positive climate change outcomes.'*

- We ask that Rural Lifestyle subdivision be limited to the periphery of existing urban areas, not those identified in the Rural areas.

Further comment: It is likely that the provision for subdivision within a Rural Lifestyle zone but not on the periphery adjacent to the Rural zone, while commendable in terms of amenity, will be problematic as landowners will likely contest their ability to subdivide if their neighbours are able to do this on a similar lot size. I.e. within the zone itself. We foresee issues of precedent being set in these situations and further erosion of the rural amenity and increased lot numbers being enabled over time.

RE: 4b. Rural Environment

TCAG agrees with WRC's previous comments to the Draft DP that *'development should be situated away from natural gully systems and that gully vegetation should be managed to avoid exacerbating actual or potential erosion (and related) risks. Identification and protection of natural gullies should be mandatory for all development in the district.'*

TCAG commend the council on working with developers in urban areas and support the protection and revegetation of gullies in the district. They can, as is well understood, have multiple benefits, not least as carbon sinks, for recreational use but also serve as invaluable ecological corridors in urban as well as rural areas.

- TCAG request consideration be given to natural gully systems in the General Rural Environment and proposed Rural Lifestyle Zone including general protection, restricted land use in close proximity to, restricted or controlled access, vegetation enhancement and management, erosion control.

Comment: We understand that identifying gullies would be possible via a GIS analysis process. This is well within the capability of Taupō District Council particularly given that there are significant LiDAR datasets currently being processed by LINZ as part of the Elevation Aotearoa programme

As per previous comments LWAG support TDC 's intention to: *'keep large spaces of land available for productive use. aiming to keep property sizes large and limit the number and location of houses.'*

- LWAG generally support the objectives and policy in this draft plan change.

RE: 4b. Rural Environment

LWAG agrees with WRC 's previous comments to the Draft DP that *'development should be situated away from natural gully systems and that gully vegetation should be managed to avoid exacerbating actual or potential erosion (and related) risks. Identification and protection of natural gullies should be mandatory for all development in the district.'*

- LWAG request consideration be given to natural gully systems in the General Rural Environment and proposed Rural Lifestyle Zone including provisions for general protection, restricted land use in close proximity to, restricted or controlled access, vegetation enhancement and management, erosion control.

Comment: We understand that identifying gullies would be possible via a GIS analysis process. This is well within the capability of Taupō District Council particularly given that there are significant LiDAR datasets currently being processed by LINZ as part of the Elevation Aotearoa programme.

Comment Re: Chapter 10 of the Regional Plan nitrogen discharge rules. LWAG have historically asked that all subdivision/land use change provide a N budget. We are concerned that providing for 2 ha subdivision in the rural areas gives a green light for increased intensification (e.g., more grazing animals and larger human population) without regard to the potential effects on Lake Taupo water quality.

- LWAG ask that the provisions ensure that the N restrictions apply to land use in the rural lifestyle zone.

LWAG are concerned that allowing further subdivision in rural areas is not congruent with Strategic Direction 1. *'Subdivision, use and development of land in the Taupo District will result in positive climate change outcomes.'* as it will potentially increase carbon emissions as there will be increased travel.

We seek Rural Lifestyle subdivision is limited to a zone adjacent to existing urban areas, i.e. not permitted in the Rural areas.

RE: RESIDENTIAL COVERAGE – CHANGE OF COVERAGE RULE - to increase the maximum building coverage in residential areas to 35%. ’

Comment: LWAG see that there are advantages to consolidating subdivision in the residential zone. However, we are concerned by the lack of provisions to prevent **the restriction of hard surfaces** in the residential zone. Hard surfaces such as paved and concrete areas mean reduced opportunities for capturing rainwater. There is increased potential for pollutant and nutrient pathways to Lake Taupo via stormwater systems .

Of specific concern is that the total coverage rule doesn’t restrict permeable surfaces. We understand that the review of the Residential Rules is pending, however, the coverage rule change will impact stormwater and we feel it needs to be addressed.

LWAG are also concerned that increasing building coverage will reduce vegetation in urban areas.

- LWAG therefore seek amending wording of the total coverage rule to have a limit on impermeable surfaces.
- We ask that a minimum of 10% of vegetation be retained per site

Re: INDUSTRIAL – ADDITIONAL INDUSTRIAL LAND ZONINGS

Ref 4.h.37 & our previous comment: ‘Low-impact design principles require monitoring and enforcing.’

- LWAG support the requirement for ‘*a stormwater management plan*’ and ask that these are enforceable.

**Organisation:**

Waka Kotahi NZ Transport Agency

First name: Luke**Last name:** Braithwaite**On behalf of:**

Waka Kotahi NZ Transport Agency

Postal address: PO Box 13055, Tauranga Central**Suburb:****City:** Tauranga**Country:** New Zealand**Postcode:** 3141**Email:** luke.braithwaite@nzta.govt.nz**Daytime Phone:** 04 978 2643

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Attached Documents

File
Attachment 2 Assessment of Plan Provisions to Provide for Human Health and Amenity in accordance with section 32 of the Resource Management Act
Waka Kotahi NZ Transport Agency Submission

Assessment of Plan Provisions to Provide for Human Health and Amenity in accordance with section 32 of the Resource Management Act



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Executive Summary

Waka Kotahi seeks a gradual reduction in health and amenity effects implemented as new activities are established or existing activities are altered in close proximity to the operational state highway network. This outcome aligns with *Toitū Te Taiao – Our Sustainability Action Plan*¹ which in turn implements the Government Policy Statement on Land Transport 2018/2019-2027/2028² and the enduring Transport Outcomes: *A framework for shaping our transport system: Enabling New Zealanders to flourish Transport outcomes and mode neutrality*, Ministry of Transport, June 2018.

Achieving these outcomes this will assist regulatory authorities achieving Part 2 of the RMA by providing for the use of natural and physical resources in a way which enables people and communities to provide for their health and safety³ and the maintenance and enhancement of amenity⁴.

There are various regulatory methods (within and outside of the RMA) to achieve this outcome. A district plan based method has been assessed as the most implementable method in the current environment. This assessment considers a range of district plan methods as required under section 32 of the RMA.

The assessment concludes that an integrated suite of district plan provisions is the most effective and efficient method to provide reasonable levels of amenity and health protection for sensitive activities. The recommended provisions are based on a (modelled) noise contour line being established with activities 'inside' the contour being subject to specific requirements to provide improved health and amenity outcomes.

The recommended provisions relate to new or altered (increased) sensitive activities located within the modelled noise contour and the usual operation of the transport network, they do not:

- a. apply retrospectively to existing buildings or sensitive activities;
- b. require land owner to address effects resulting from transport network defects (eg potholes), which are the responsibility of the road controlling authority; or
- c. manage amenity effects from transport noise from new or altered roads where these fall within the ambit of NZS 6806:2010 (Acoustics – Road traffic noise – New and altered roads).

¹ <https://www.nzta.govt.nz/assets/About-us/docs/sustainability-action-plan-april-2020.pdf>

² See paragraphs 123-124 and Table 1 Action 25 – Environment.

³ Section 5(2), RMA.

⁴ Section 7(c), RMA.

1. Introduction

The report has been prepared by Waka Kotahi NZ Transport Agency in accordance with Section 32 of the Resource Management Act 1991 (RMA) to assess the inclusion of human health and amenity provisions within District Plans.

Managing health effects from road noise is a shared responsibility between the road controlling authority and adjacent land users. Territorial authorities also have an important role to play in ensuring that planning instruments appropriately acknowledge and address the issue. Waka Kotahi invests significantly in design, construction and ongoing maintenance to minimise the effects of road noise. It is appropriate that those establishing or modifying land uses adjacent to existing State highways also share responsibility for protecting the health of occupants.

Retrospective management of transport noise effects is generally more difficult and expensive to achieve once activities have established adjacent to transport corridors. Management options are also more limited once activities are in place. For example, some design responses (eg. locating outdoor living areas away from noise sources) are not easily implemented or are precluded, retrospective building improvements can be challenging to implement, costly and disruptive, and property constraints may also limit response options (eg. no land available for acoustic barriers or bunding).

This report evaluates opportunities to provide plan provisions in accordance with section 32 of the RMA (s32). Under the RMA, a section 32 evaluation must:

- a. Examine whether the proposed objectives are the most appropriate way to achieve the purpose of the RMA (s32(1)(a));
- b. Examine whether the proposed provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing their efficiency and effectiveness and summarising the reasons for deciding on provisions (s32(1)(b));
- c. Relative to considering the efficiency and effectiveness of the provisions in achieving the objective, include an assessment of the benefits and costs of the effects anticipated from implementing the provisions (s32(2)); and
- d. Contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from implementing the proposal (s32(1)(c)).
- e. For plan changes, evaluate the proposal against both the objectives of the proposed plan change and the objectives of the existing plan (s32(3)).

Each of these matters is addressed by examining the key issues pertaining to the human health and amenity, and how a range of responses could operate in order to achieve the desired outcomes. This report is supplemented by an 'issue identification' statement (Section 2) which describes the human health effects at issue and assesses the cost of implementing mitigation.

In addition to RMA Part 2 outcomes (including of providing for communities health⁵), Waka Kotahi seeks a gradual reduction in exposure as existing activities are altered or relocated. This outcome aligns with *Toitū Te Taiao – Our Sustainability Action Plan*⁶ which in turn implements the Government Policy Statement on Land Transport 2018/2019-2027/2028⁷ and the enduring Transport Outcomes: *A framework for shaping our transport system: Enabling New Zealanders to flourish Transport outcomes and mode neutrality*, Ministry of Transport, June 2018.

⁵ Resource Management Act, Part 2, Section 5(1).

⁶ <https://www.nzta.govt.nz/assets/About-us/docs/sustainability-action-plan-april-2020.pdf>

⁷ See paragraphs 123-124 and Table 1 Action 25 – Environment.

2. Issue identification

It is widely accepted nationally and internationally that noise from transport networks have the potential to cause adverse health and amenity effects on people living nearby. That potential has been documented by authoritative bodies such as the World Health Organisation (WHO)⁸ including the publication *Environmental noise guidelines for the European region* in October 2018 (WHO Europe Guidelines).⁹ The WHO Europe Guidelines are based on a critical review of academic literature and followed a rigorous protocol to assess the evidence of adverse effects.

With respect to sound from transport networks, the WHO Europe Guidelines note the potential for the following adverse effects:

- i. sleep disturbance;
- ii. high annoyance;
- iii. hypertension; and
- iv. ischaemic heart disease.

Based on the strength of the evidence of adverse effects, WHO recommends that policymakers reduce sound exposure from transport networks to below a range of guideline values.

State highways¹⁰ pass through both urban and rural areas and most have sufficient traffic volumes to generate sound above WHO Europe Guideline levels, indicating there will be impacts on human health and amenity where noise-sensitive activities locate nearby.

In New Zealand, Quality Planning's *Managing Land Transport Noise Under the RMA 2013 Guidance Note*¹¹ recognises that transport noise has potential health effects and identifies district plan responses (eg. managing sensitive activity location, setbacks, zoning (and re-zoning), and structural restrictions). The Guidance Note provides:

*One of the environmental results expected with the management of noise in plans should be the protection of people and communities from the impacts of land transport noise exposure*¹².

Within the Guidance Note, five alternative (non-RMA) responses¹³ are identified (urban design strategy, bylaws, NZ Standards, Building Code and Waka Kotahi guidance). Two of these (the Building Code and Waka Kotahi guidance) are addressed in this assessment.

⁸ World Health Organisation, Guidelines for community noise, 1999; World Health Organisation, Night noise guidelines for Europe, 2009; World Health Organisation, Burden of disease from environmental noise, 2011

⁹ World Health Organisation, Environmental noise guidelines for the European region, 2018.

¹⁰ May also apply to high traffic volume roads managed by other Road Controlling Authorities.

¹¹ <https://www.qualityplanning.org.nz/node/825>

¹² <https://www.qualityplanning.org.nz/node/825> 4. Environmental Effects Expected – Optional, page 12.

¹³ <https://www.qualityplanning.org.nz/node/825> Local Approaches – other mechanisms, page 14.

3. Objectives Assessment

Section 32(1)(a) of the RMA requires an examination of whether a proposed objective is the most appropriate way to achieve the purpose of the RMA. The purpose of the RMA is set out in Part 2, Section 5 of the Act.

5 Purpose

(1) The purpose of this Act is to promote the sustainable management of natural and physical resources.

(2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and

(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

Waka Kotahi has formulated proposed objectives and policies for inclusion in district plans. An assessment of the proposed objective against RMA section 5 is set out in Table 1, below.

Table 1: Assessment of Objective under Section 5	
Proposed Provision	Reason
<p>Objective 1 Protect sensitive activities from potential health and amenity effects that may arise from operational state highway noise.</p> <p>Policy 1 Locate and design new and altered buildings containing noise sensitive activities to minimise the potential for adverse effects from the designated state highway network.</p> <p>Policy 2 Manage subdivision which could contain noise sensitive activities through setbacks, physical barriers and design controls to ensure subsequent development can be located, designed and constructed to minimise exposure to noise.</p>	<p>Section 2 of this report describes likely adverse effects on sensitive activities where they are located in close proximity to the transport network.</p> <p>The objective (and supporting policies) will enable communities to provide for their social well-being and health by ensuring that noise sensitive activities located in close proximity to a state highway incorporate appropriate protection so as to ensure improved health outcomes and amenity levels.</p>

The balance of Part 2 of the RMA provides the framework for the sustainable management of natural and physical resources. Section 6 lists matters of national importance that shall be recognised and provided for, section 7 lists other matters that all persons exercising functions and powers under the RMA shall have particular regard to and section 8 addresses matters relating to the principles of the Treaty of Waitangi. No relevant matters in sections 6 or 8 have been identified. The proposed objective has been assessed against the following provisions of section 7 in Table 2.

Table 2: Assessment of Objective under Part 2 Section 7	
RMA Provision	Objective 1
s7(b) (the efficient use and development of natural and physical resources)	Objective 1 will provide for the efficient use and development of physical resources (land and the State highway network) by enabling the proximity effects of land use and infrastructure to be managed appropriately.
s7(c) (maintain and enhance amenity values)	Objective 1 will give effect to s7(c) by enhancing amenity by reducing effects of noise on noise-sensitive activities.

It is considered that the proposed objective is consistent with Part 2, section 5 of the Act and will result in the sustainable management of natural and physical resources.

4. Provisions Assessment

Sections 32(1)(b) and 32(2) require assessment of the proposed plan provisions to be undertaken. These are summarised as:

- a. whether the proposed provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing their *efficiency and effectiveness* and summarising the reasons for deciding on provisions; and
- b. relative to considering the **efficiency and effectiveness** of the provisions in achieving the objective, include an assessment of the benefits and costs of the effects anticipated from implementing the provisions.

The cost and benefit assessment must identify and assess the costs and benefits associated with environmental, economic, social, and cultural effects including economic growth and employment that are anticipated to be provided or reduced. If practicable, these are to be quantified.

Section 32(2)(b) also requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information. In this case, there is considered to be sufficient information about the subject to determine the range and nature of effects of the options set out, and so that assessment has not been undertaken.

4.1 Noise

4.1.1 Identifying options

Where the reasonably practical alternative options (assessed in Table 3) include plan provisions, they are framed in the following context:

- a. The provisions apply to all new and altered (by increase in floor area) *Noise Sensitive Activities* (defined in **Attachment 1**) which, in addition to residential activities, includes activities such as student or retirement accommodation, educational activity (including in any child care facility), healthcare activity and any congregations within places of worship/marae.
- b. Internal noise criteria of between 35 dB $L_{Aeq(24h/1h)}$ and 45 dB $L_{Aeq(24h/1h)}$ have been allocated to the *Noise Sensitive Activities* for the reasons described in **Attachment 2**. Specifications detailing how to achieve internal noise space can be either specified as a *Construction Schedule* included as part of **Attachment 1** or by a design certified by an acoustic consultant.
- c. Provisions include ventilation requirements where internal noise criteria are to be met; without ventilation the effectiveness of built acoustic treatment is compromised (ie. windows open for ventilation compromise the performance of building envelope noise mitigation measures). Ventilation requirements are specified in **Attachment 1**.
- d. Outdoor living space provisions apply only to areas specifically identified by the district plan as required outdoor living areas.
- e. Provisions include a mapped extent to which the provision would apply. This is described as Noise Control Boundary Overlay (NCBO) in accordance with the National Planning Standards Mapping Standard or identified as a 'yard'.

- f. The provisions:
- (i) do not apply retrospectively to existing sensitive activities;
 - (ii) are not proposed to require a land owner to address effects resulting from transport network defects (eg potholes), which are the responsibility of the road controlling authority; and
 - (iii) do not manage amenity effects from transport noise from a new or altered road; these generally fall within the ambit of NZS 6806:2010 (Acoustics – Road traffic noise – New and altered roads).

The reasonably practical alternative options identified include (a) to (d) above and are identified as:

- a. **Do nothing:** No plan provisions to protect sensitive activities from potential health and amenity effects.
- b. **Modelled setback:** Require specific response to manage noise based on a (modelled) noise contour line (NCBO) being established. Activities 'inside' the NCBO are a permitted activity (for the purposes of noise) if specific requirements are met. For the reasons set out in **Attachment 2**, the recommended extent of the NCBO is set at 57 dB $L_{Aeq(24h)}$. **Attachment 4** explains the basis of the acoustic model which takes into account environmental factors such as traffic volume, road surface, topography and buildings.
- c. **Metric setback:** Require specific response to manage noise where a sensitive activity is located within a specific NCBO based on distance (eg 40m, 80m or 100m) from a state highway. The specific setback distance may be based on speed limit (eg 40m for <70k/hr or 80m or 100m >70k/hr). Activities 'inside' the NCBO are a permitted activity if specific requirements are met.
- d. **Yard:** A 'no build' setback from state highways. All noise sensitive activities in the yard area are listed non-complying activities. Yard setback could be set based on road speed limit (eg 40m for <70k/hr or 80m or 100m >70k/hr).

An assessment of the *efficiency and effectiveness* of the options assessed in terms of Sections 32(1)(b) and 32(2) is included in Table 3.

Table 3: Alternative Option Assessment			
Option	Effectiveness and Efficiency	Costs	Benefits
Option A: Do Nothing	<p>Highly efficient but not effective.</p> <p>This option requires no action from the regulatory authority or applicants so is efficient.</p> <p>It is considered to be the least effective as it will allow an increase in adverse human health and amenity effects over time.</p>	<p>An increase in adverse health and amenity impacts (including costs). Poorer health and amenity outcomes fall on wider community and can be difficult to identify or resolve at an individual level.</p>	<p>No additional regulatory cost or costs to land owners in terms of compliance or building cost increases.</p>
Option B: Modelled Setback	<p>Highly efficient and effective.</p> <p>Utilising a model based on existing environmental conditions to calculate expected noise levels provides a more effective and efficient approach to setting the extent that a noise control should apply compared with Options C and D (both of which are 'standard width' controls regardless of local conditions).</p>	<p>A range of compliance and construction costs will apply when compared with Option A. These range from building and compliance design costs to meet permitted activity standards through to resource consent costs should standards not be complied with.</p> <p>The costs will fall on applicants and compliance confirmation costs will be borne by the regulatory authority and/or the applicant.</p> <p>Costs of mitigation have been independently assessed by Acoustic Engineering Services Limited¹⁴ and indicate typically a 0% to 2% increase in</p>	<p>Better human health outcomes as there will be less exposure to the causes of negative health and amenity outcomes when compared with Option A.</p> <p>Option B provides a comprehensive regulatory approach which recognises the spatial extent of road traffic noise based on environmental factors (eg traffic volume, topography, road surface, existing building locations). This will result in a more accurate reflection of the extent of likely effects than Options C or D.</p> <p>The provisions do not aim to achieve 'zero' health effects (which is the outcome sought by</p>

¹⁴ **Attachment 3:** Acoustic Engineering Services Limited, Report Reference AC20063 – 01 – R2: Cost of traffic noise mitigation measures, 12 June 2020.

Table 3: Alternative Option Assessment			
Option	Effectiveness and Efficiency	Costs	Benefits
		<p>construction cost for new dwellings and additions¹⁵ in new materials.</p> <p>Waka Kotahi will also bear the cost of maintaining up to date modelling data to support noise contour line establishment.</p>	<p>the WHO Guidelines). Rather, the Modelled Setback/Option B provisions provide for a balance between health and amenity protection, cost and regulatory administration.</p>
Option C: Metric Setback	<p>Moderately efficient and effective.</p> <p>Option provides a reasonable outcome but will 'capture' more sites than is necessary to be highly efficient.</p>	<p>Option C (especially where applied at 80m to 100m) is likely to affect a greater number of sites than Option B. It is a 'blanket' approach which does not reflect individual area conditions.</p> <p>Other costs are the same as for Option B.</p>	<p>Better human health outcomes as there will be reduced exposure to the causes of negative health and amenity outcomes when compared with Option A.</p> <p>Less costly to prepare (set distance rather than modelled) when compared with Option B.</p>
Option D: Yard provision	<p>Highly effective but not efficient.</p> <p>The 'no build' yard will provide a high level of health and amenity protection but does not result in an efficient use of land.</p>	<p>Limits construction on particular areas of a site; high cost borne by land owners as sensitive activity development is limited in these areas.</p>	<p>Good human health outcomes as there will be a reduced number of sensitive activities exposed to the causes of negative health and amenity outcomes.</p>

4.1.2 Assessing reasonably practicable options

Based on the cost benefit analysis presented in Table 3, Table 4 summarises reasonably practicable options.

Table 4: Identifying Reasonably Practicable Options	
Option	Is it reasonably practicable?
<i>Option A: Do nothing</i> This option is currently applied in some District Plans.	✓
<i>Option B: Modelled Setback</i>	✓

¹⁵ **Attachment 3:** Acoustic Engineering Services Limited, Report Reference AC20063 – 01 – R2: Cost of traffic noise mitigation measures, 12 June 2020.

Options similar to this are currently applied in some District Plans.	
<i>Option C: Metric Setback</i> Options similar to this are currently applied in some District Plans.	✓
<i>Option D: Yard requirement</i> Options similar to this are currently applied in some District Plans.	✓

4.1.3 Preferred option

Based on the analysis in Table 3 and the reasonably practicable options identified in Table 4, Table 5 rates each of the reasonably practicable options.

Table 5: Preferred Option			
Least Preferred			Most Preferred
Option A: Do Nothing.	Option D: Yard setback	Option C: Metric Setback	Option B: Modelled Setback

For the reasons set out in Tables 3 and 4, the Modelled Setback/Option B is considered to be the most efficient and effective method for addressing the health and amenity effects of transport noise.

However, as specific modelling is yet to be completed for the Taupo Region at this time Waka Kotahi are seeking a Metric Setback of 100m. Waka Kotahi anticipate that modelling can likely be completed at the time of further submissions and have allowed for scope in the submission to provide for an amendment to provide for a modelled rather than metric setback.

5. Conclusion

The Modelled Setback/Option B is identified as the preferred approach to manage the potential health and amenity effects of transport network operations, and to and provide a reasonable and appropriate balance between cost and benefit. The provisions apply only where an existing noise-sensitive activity is extended or a new noise-sensitive activity is proposed adjacent to a designated transport corridor.

The Modelled Setback/Option B have been detailed and compared against a number of alternatives in terms of their costs, benefits, and efficiency and effectiveness in accordance with the relevant clauses of section 32 of the RMA.

The Modelled Setback/Option B are considered to represent the most appropriate means of achieving the proposed objective and of addressing the underlying resource management issues relating to the transport environment, human health and amenity. However, until modelling is completed for the Taupo Region a 100m Metric Setback / Option C is sought which achieves outcomes similar to Modelled Setback/Option B however does not reflect individual area conditions.

New or altered State highway transport projects will continue to be assessed under NZS 6806:2010 (Acoustics – Road traffic noise – New and altered roads).

Attachment 1: Provisions (Option B)

Objective 1

Protect sensitive activities from potential adverse health and amenity effects that may arise from designated state highway noise.

Policy 1

Locate and design new and altered buildings containing noise sensitive activities to minimise the potential for adverse effects from the designated state highway network.

Policy 2

Manage subdivision which could contain noise sensitive activities through setbacks, physical barriers and design controls to ensure subsequent development can be located, designed and constructed to minimise exposure to noise.

New Definition

Noise Sensitive Activity(s): Means any residential activity including visitor, student or retirement accommodation, educational activity including in any child care facility, healthcare activity and any congregations within places of worship/marae. Excludes those rooms used solely for the purposes of an entrance, passageway, toilet, bathroom, laundry, garage or storeroom.

1. Permitted Activity Rule Indoor Noise

- a. Within the Noise Corridor Boundary Overlay, where:
 - (i) a new building that contains a noise sensitive activity; or
 - (ii) an alteration to an existing building resulting in an increase in floor area of a noise sensitive activity; or
 - (iii) a new noise sensitive activity is located in an existing building;

is proposed, it is to be:

- (iv) Designed, constructed and maintained to achieve indoor design noise levels not exceeding the maximum values in Table 1; and
- (v) If windows must be closed to achieve the design noise levels in (1)(a)(i), the building is designed, constructed and maintained with a mechanical ventilation system that:
 - a. For habitable rooms for a residential activity, achieves the following requirements:
 - i. Provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and
 - ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and
 - iii. provides relief for equivalent volumes of spill air; and
 - iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C; and
 - v. does not generate more than 35 dB $L_{Aeq(30s)}$ when measured 1 metre away from any grille or diffuser.
 - b. For other spaces, is as determined by a suitably qualified and experienced person.

- c. A report is submitted by a suitably qualified and experienced person to the council demonstrating compliance with clauses (1)(a)(i) and (ii) above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise.

Table 1

Occupancy/activity	Maximum road noise level ^{Note 1} L _{Aeq} (24h)
<i>Building type: Residential</i>	
Sleeping spaces	40 dB
All other habitable rooms	40 dB
<i>Building type: Education</i>	
Lecture rooms/theatres, music studios, assembly halls	35 dB
Teaching areas, conference rooms, drama studios, sleeping areas	40 dB
Libraries	45 dB
<i>Building type: Health</i>	
Overnight medical care, wards	40 dB
Clinics, consulting rooms, theatres, nurses' stations	45 dB
<i>Building type: Cultural</i>	
Places of worship, marae	35 B

Note 1: The design road noise is to be based on measured or predicted external noise levels plus 3 dB.

2. Permitted Activity Rule Outdoor Living Area

- a. Where an outdoor living or outdoor activity space required by another rule in the Plan is within the Noise Corridor Boundary Overlay and the outdoor space is required for a noise sensitive activity, the required outdoor living space is to be designed and maintained to achieve noise levels not exceeding the maximum values in Table 2; and
- b. A report is submitted by a suitably qualified and experienced person to the council demonstrating compliance with clauses (2)(a) above prior to the construction or alteration of the any building to which the outdoor living space relates.

Table 2

Activity	Maximum road noise level ^{Note 1} L _{Aeq(24h)}
Required Outdoor Living Space	57 dB

Note 1: The design road noise is to be based on measured or predicted external noise levels plus 3 dB.

3. Restricted Discretionary Activity Rule

Any new or altered noise sensitive activity which does not comply with Permitted Activity (1) or (2).

Restricted Discretionary Activity – Matters of Discretion

Discretion is restricted to:

- (a) Location of the building and outdoor living space;
- (b) The effects of the non-compliance on the health and amenity of occupants; and
- (c) The outcome of any consultation with Waka Kotahi NZ Transport Agency.

Restricted Discretionary Activity – Assessment Criteria

Discretion is restricted to:

- (a) Whether the location of the building minimises effects;
- (b) Alternative mitigation which manages the effects of the non-compliance on the health and amenity of occupants; and
- (c) The outcome of any consultation with Waka Kotahi NZ Transport Agency.

Attachment 2: Technical Basis of Noise Criterion

In preparing the Modelled Setback/Option B, Waka Kotahi has assessed existing research, standards and guidelines to guide selection of appropriate noise criteria.

Two documents are identified as providing national and international guidance and directives for transport noise: the WHO Europe Guidelines and NZS 6806:2010 *Acoustics – Road-traffic noise – New and altered roads* (NZS 6806).

In addition, AS/NZS 2107:2016 *Acoustics – Recommended design sound levels and reverberation times for building interiors* (AS/NZS 2107) is a joint Australia and New Zealand standard which provides compliance measurement methods for background noise and recommends design criteria for occupied spaces.

WHO Europe Guideline

The WHO Europe Guidelines (the Guideline) contains key recommendations in regards to transport noise including:

Road¹⁶:

- For average noise exposure: recommends reducing noise levels produced by road traffic below 53 dB L_{den} ; and
- For night time exposure: recommends reducing noise levels produced by road traffic during night time below 45 dB L_{night} .

The WHO Europe document contains guidelines; it does not set a fixed standard. The Guideline has been prepared as an international research document and its outcomes need to be considered within the New Zealand statutory context before reference or inclusion in planning or policy documents. WHO guidance regarding effects of noise on health (more generally) are reflected in NZS 6806¹⁷.

NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads

NZS 6806 is the principal national document for management of noise in relation to new and altered roads. The purpose of NZS 6806 is to ensure noise effects on existing sensitive activities (described as Protected Premises and Facilities / PPFs) from new or altered roads are managed. It has been developed with the intention of being suitable to support RMA processes and to set reasonable noise criteria for road traffic noise (from new or altered roads) taking into account, among other things, health effects¹⁸.

NZS 6806 is a national standard, has been specifically developed for inclusion within an RMA framework, has been adopted into district plans and utilised in designations for the specific purpose of transport noise management. It is accepted as current good practice in regards to setting requirements which result in *reasonable* noise outcomes.

¹⁶ World Health Organisation, Environmental noise guidelines for the European region, 2018. Section 3.1.

¹⁷ NZS 6806 :2010 Section 4.7.1.

¹⁸ NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads, section 1.1.4.

NZS 6806 includes an external (“Category A”) noise criterion¹⁹ for altered roads (64 dB $L_{Aeq(24h)}$), and two criteria for new roads depending on design year traffic volumes (64 dB $L_{Aeq(24h)}$ for higher volume roads and 57 dB $L_{Aeq(24h)}$ for lower volume roads).

Higher volume roads are those which, at design year, are predicted to carry greater than 75,000 AADT (Average Annual Daily Traffic). Lower volume roads are those which, at design year, are predicted to carry between 2,000 and 75,000 AADT.

Internal noise criterion²⁰ for habitable spaces are set at 40 dB $L_{Aeq(24h)}$ for altered and new roads (regardless of AADT).

Analysis of 2018 AADT data²¹ shows the majority of existing state highways carry less than 75,000 AADT. It also indicates that only central parts of the Auckland motorway network currently have an AADT greater than 75,000.

While NZS 6806 applies to new and altered roads (ie. the onus is on the road controlling authority to manage effects), it provides strong guidance as to *reasonable* levels and expectations of noise levels in these environs. If these (<75,000 AADT) state highways were constructed (new) or altered in the current statutory environment, the lower level (57 dB $L_{Aeq(24h)}$) of the NZS 6806 external noise limits would be applied.

For road-traffic noise averaged over 24 hours, the internal 40 dB $L_{Aeq(24h)}$ criterion in residential habitable spaces from NZS 6806 represents a reasonable level as at night the level should reduce (as traffic volumes reduce) so as to avoid undue sleep disturbance.

AS/NZS 2107 Acoustics – Recommended design sound levels and reverberation times for building interiors

The scope of AS/NZS 2107 is to recommend criteria for healthy, comfortable and productive environments and it applies to steady-state or quasi-steady-state sounds. The Standard is ambiguous whether it should apply to transportation noise; regardless it provides an indication of reasonable internal levels for different types of sensitive activities. The criteria adopted in the Modelled Setback/Option B are generally consistent with AS/NZS 2107.

Conclusion

For the Modelled Setback/Option B, Waka Kotahi selected the NZS 6806 external level of 57 dB $L_{Aeq(24h)}$ and internal levels of between 35 dB $L_{Aeq(24h/1h)}$ and 45 dB $L_{Aeq(24h/1h)}$. This is because:

- a. the majority of state highway AADT fall within the lower AADT band for external noise within NZS 6806 (which requires external noise levels of 57 dB $L_{Aeq(24h)}$ for a new or altered road); and

¹⁹ NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads, Table 2 – Noise Criteria, A (primary free-field external noise criterion).

²⁰ NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads, Table 2 – Noise Criteria, C (internal noise criterion).

²¹ <https://www.nzta.govt.nz/resources/state-highway-traffic-volumes/> 2018 data - State highway volumes by region (in Excel format)

- b. the outdoor noise exposure level of 57 dB and an indoor noise threshold near the top of the design range²² in AS/NZS 2107:2016 (40 dB) have been selected as these levels are considered to provide a reasonable level of health and amenity protection but are not the most stringent.

²² *top of the design range* means that the noise limit is at the upper level of range - ie. allows more noise rather than less.

Attachment 3: Building Cost Assessment



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Memorandum

To: Greg Haldane, Waka Kotahi
From: Clare Dykes, Acoustic Engineering Services
File Reference: AC20063 - 01 - R2
Date: Friday, 12 June 2020
Project: Cost of traffic noise mitigation measures
Pages: 6

Meeting Telephone Memorandum File Note

Dear Greg,

In March 2020, Waka Kotahi NZ Transport Agency engaged Acoustic Engineering Services (AES) and O'Brien Quantity Surveying to undertake a study relating to the cost of traffic noise insulation measures. The project involved a review of a number of situations where traffic noise mitigation had been installed, including:

- Buildings which required upgrades to reduce traffic noise break-in as a result of their location in proximity to major roads, and;
- New residential neighbourhoods which were constructed near to major roads, where traffic noise barriers were integrated into the overall scheme design so that the upgrading of dwellings was no longer required (or was reduced) and noise in outdoor living areas was reduced.

This memorandum summarises the study, and the general trends visible in the results.

1.0 BUILDING UPGRADES

A common method of ensuring that noise from roads is not intrusive within buildings is to design the building envelope to provide a high level of sound insulation, and to provide a mechanical ventilation system so occupants do not need to open windows for cooling and fresh air.

The Christchurch District Plan contains a rule requiring the design of new noise sensitive buildings to be constructed in higher noise locations to include these sound insulation features. AES have previously completed a study related to the Christchurch District Plan sound insulation rule, which involved a review of the specific circumstances relating to a sample of building projects. The work described in this memo built on aspects of that previous study, and looked to quantify the cost of those building upgrades, to assist Waka Kotahi in understanding the potential financial implications of mandatory traffic noise insulation rules. A number of additional examples from various sources were added to the original sample, to increase the sample size and diversity.

We have also completed a review of the Proposed and Operative District Plans for the 67 New Zealand Districts. Two thirds of the District Plans throughout the country include requirements for sound insulation when dwellings are located in proximity to major roads. Of these, 10 % include a requirement which is very

similar to the Waka Kotahi Guidelines¹ centred around an internal noise level requirement of 40 dB L_{Aeq} (24 hour) in bedrooms and other habitable spaces, and the provision of mechanical ventilation. The remaining rules vary, with common variations including requiring different internal noise levels to be met, omitting any mechanical ventilation requirement (or a reduced mechanical ventilation requirement), and specifying a fixed level of sound insulation performance to be achieved by the building façade. As discussed below, all of these rule variations have a different cost impact.

1.1 The sample

A total of 58 buildings were considered for inclusion in the analysis. However, detailed costings were only completed on 23 of these, primarily because:

- A number of the building projects successfully obtained a Resource Consent to legitimise a partial or complete non-compliance with the relevant sound insulation rule, and so these results would not have assisted with understanding the cost of compliance.
- For a number of the building projects there was not sufficient publicly available information to complete an accurate costing.

The final 23 building projects included 11 detached residential dwellings, seven multi-residential units (such as terraced houses and duplexes), and five apartment buildings. These buildings were expected to experience worst-case traffic noise levels ranging from 55 dB L_{Aeq} (24 hours) to 71 dB L_{Aeq} (24 hours).

As discussed above, a variety of sound insulation rules are encountered throughout the country. The building projects in the sample had been assessed against the following rules:

- 12 of the sample has been assessed against a requirement which is similar to that described in the Waka Kotahi Guidelines, including an internal noise level requirement of 40 dB L_{Aeq} (24 hour) in bedrooms and other habitable spaces, and the provision of mechanical ventilation.
- Two of the sample were assessed using a rule which has a different internal noise level requirement with no mechanical ventilation required.
- Eight of the sample were assessed against rule with a façade reduction requirement or a provided set of constructions intended to provide a fixed façade reduction, and no mechanical ventilation required.
- One involved review against an internal noise level requirement of 40 dB L_{Aeq} (24 hours) for some spaces, and a façade reduction requirement for others.

Overall, the sample was relatively small – however a moderate number of examples could be assessed against a rule similar to that preferred by Waka Kotahi. Otherwise the variety within the sample is typical of the variety in sound insulation rules encountered in New Zealand.

Challenges of extending the sample included the lack of a centralised database to use for establishing a list of building projects of potential interest, and then the lack of availability of publicly available information for projects which provides sufficient detail for accurate costings.

1.2 Assumptions

Key assumptions embodied in this part of the study are as follows:

¹ Waka Kotahi NZ Transport Agency, *Guide to the management of effects on noise sensitive land use near to the state highway network*, Version 1.0, September 2015

- The reported external noise levels are based on the available traffic numbers, road surface, and speed information for the road adjacent to the building project site at the time, and are for the most exposed building façade.
- The upgrades that were recommended by the acoustic engineers involved in each case were installed and alternative systems were not used.
- The systems where not specified were originally 10 mm Standard Gib plasterboard internal linings for walls, and 13 mm Standard Gib plasterboard linings for ceilings, and 4 mm float glass / 12 mm air space / 4 mm float glass for glazing.
- Where 7 mm Ecoply RAB board was specified for external walls it was assumed that this would have been included regardless of the acoustic upgrades, and so was not included in the upgrade costing.
- Where not specified, the mechanical ventilation system was assumed to be of similar or equal design and performance to those projects where this detail was provided.

1.3 Findings

We have summarised a number of key observations from the analysis below.

Table 1.1 outlines the increase in overall building cost associated with any upgrades to the building façade and/or the installation of mechanical ventilation system, to ensure compliance with the various sound insulation rules.

Table 1.1 – Summary of cost of traffic noise mitigation by building type

Building Type	Range of external noise levels (dB L _{Aeq} (24 hours))	Increase in overall cost of building (per residential unit)	Percentage increase in overall cost of building
Detached residential	55 – 68	\$0 – \$16,000	0 – 2 %
Residential units	58 – 69	\$500 – \$15,000	0 – 2 %
Apartment buildings	60 – 71	\$500 – \$16,000	0 – 1 %

These results illustrate that the overall percentage increase in building cost due to compliance with a sound insulation rule was 2 % or less (noting that none of the buildings in the sample were exposed to external traffic noise levels exceeding 71 dB L_{Aeq}(24 hour)).

For the residential units and apartment buildings, the figures in table 1.1 are based on the total cost of upgrades, divided by the total number of residential units in the development. However, some units did not require any upgrades, as they experience lower external noise levels. If the total cost of upgrades is only divided by the number of units in the development which required upgrading, the percentage increase changes to 1 – 4 %.

In table 1.2 the results are presented based on the type of sound insulation rule that the assessment was undertaken against.

Table 1.2 – Summary of cost of traffic noise mitigation by rule type

Rule	Range of external noise levels (dB L_{Aeq} (24 hours))	Increase in overall cost of building per residential unit	Percentage increase in overall cost of building
Internal noise level of 40 dB L_{Aeq} (24 hours) and mechanical ventilation	55 - 71	\$0 - \$16,000	0 - 2 %
Alternative internal noise level requirement, no mechanical ventilation	64 - 65	\$500 - \$1,500	0 - 1 %
Façade reduction requirement or defined constructions, and no mechanical ventilation	55 - 69	\$0 - \$16,000	0 - 2 %

This summary appears to indicate that the costs associated with both the internal noise level and façade reduction rules are similar (noting that the sample size for the 'alternative internal noise level requirement, no mechanical ventilation' rule was very small, and the external levels were moderate). However, we note the following:

- For the methods which used internal noise levels, the increase in costs is very dependent on the external noise level. The developments which resulted in upgrade costs of less than 1 % typically experienced external noise levels below 65 dB L_{Aeq} (24 hours). There are exceptions to this depending on the layout of the units.
- While the 'façade reduction requirement or defined constructions' rules appear to attract a similar cost to the 'internal noise level' rules, those particular rules did not require mechanical ventilation to be installed. Occupants in some situations would therefore have still had to choose between thermal comfort, and noise. Additional cost should have been involved with installing mechanical ventilation in those situations, as was the case for the 'internal noise level of 40 dB L_{Aeq} (24 hours) and mechanical ventilation' examples. To put it another way, the cost may be similar, but the benefit is likely to have been less in many cases.
- The required construction upgrades (and therefore the costs) of the 'façade reduction requirement or a defined set constructions' rules are not dependent on external noise levels. This means that while the range of cost increases is similar, in some situations the high costs lead to no benefit, as the external noise levels were low. For the 'internal noise level of 40 dB L_{Aeq} (24 hours) and mechanical ventilation' examples where the costs were high, that was at least in response to high external noise levels and so was justified.

For a small number of developments, no upgrades were required as either external traffic noise levels were very low, or the original design included high mass cladding with small window areas on key facades.

2.0 BARRIERS

An alternative method for reducing the levels of road traffic noise experienced by the occupants of new dwellings is for a barrier to be installed to screen a new residential neighbourhood from the road. This means that individual dwellings are less likely to need to be upgraded, and noise levels in outdoor living areas are also reduced. However, the developer of the new neighbourhood is likely to primarily bear the cost of the barrier, compared to the building upgrades discussed in section 1.0 above, which are paid for by the individual building owners.

2.1 The sample

10 new residential neighbourhoods were included in the analysis. All of these adjoined State Highways and were likely to have been designed with some regard to the Waka Kotahi Guidelines. Each of the neighbourhoods had been screened from the State Highway with a traffic noise barrier, including:

- Seven examples with 'acoustic' fences ranging in height from 2 – 3 metres
- Two examples where earth bunds had been constructed – these were 2 – 3 metres in height, and 8 – 9 metres wide
- One example with a combination of acoustic fencing and earth bund

For each example, we determined the number of dwellings which would have experienced traffic noise levels of greater than 57 dB $L_{Aeq(24\text{ hours})}$ without a barrier. These dwellings would have been the most likely to have required upgrading had the barrier not been constructed, in order to satisfy a traffic noise insulation rule of the type discussed in section 1.0 above. We note that it is possible that some dwellings still required upgrading even with the barrier – for example the upper level of two-storey houses. As above, the barrier also reduces the noise levels in outdoor living areas associated with dwellings – which is a benefit compared to the sound insulation rules discussed in section 1.0, which only modifies the environment within a dwelling.

The number of dwellings which would have experienced traffic noise levels of greater than 57 dB $L_{Aeq(24\text{ hours})}$ without a barrier ranged from 1 through to 120. The number of affected lots was dependent on the overall layout of the subdivision relative to the road, as well as the traffic numbers, road surface, and speed.

2.2 Assumptions

Key assumptions were as follows:

- The acoustic fences were constructed of 125 x 75 mm H4 posts, 75 x 50 mm H3 railings, 150 x 25 mm H3 palings with 50 x 25 mm H3 battens over joins and 150 x 50 mm H3 capping.
- In some cases, the effective height of fences was increased, because they were constructed on top of a retaining wall. It was assumed that the retaining walls would have been required for general site levelling and not specifically to enhance the acoustic effectiveness of the barrier. This was therefore not included within the upgrade cost.
- It was assumed that the subdivision layout without the barrier would have been exactly the same. In reality larger setback distances or other rearrangement of the layout may have been included if the traffic noise had not been largely mitigated by the barrier.
- The earth bund was assumed to be constructed with surplus excavated soil from the site, with a layer of imported topsoil 150 mm thick spread on top for grass.

2.3 Findings

We have summarised a number of key observations from the analysis below.

Table 2.1 shows the cost of each barrier, divided by the number of dwellings which would have experienced a noise level of greater than 57 dB $L_{Aeq(24\text{ hours})}$ without a barrier. We have grouped the results together for different barrier types, and have also shown the situations where are large and small number of dwellings benefited from the barrier separately.

Table 2.1 - Summary of cost of traffic noise mitigation by barrier type

Barrier Type	Approximate number of dwellings which benefited from barrier	Cost of barrier per dwelling
Acoustic fence	1 - 10	\$15,000 - \$30,000
	30	\$10,000
	80 - 110	\$3,000 - \$5,000
Earth bund	10	\$60,000
	50	\$6,000
Combination	120	\$4,000

Overall, this analysis shows that when the number of affected dwellings is low (i.e. the layout results in few lots near the road, or the volume of traffic is low etc.) the overall cost per dwelling is high. When these absolute costs are viewed as a percentage of the likely final value of each of the affected sections, the range is from 2 % (acoustic fence, benefiting a large number of sections) to 30 % (earth bund, benefiting a few sections). As above, in all of these examples for dwellings constructed on these sections, additional costs in the order of those presented in tables 1.1 and 1.2 above would be largely avoided, and traffic noise levels in outdoor living areas would also be reduced.

We note that a key decision in the above analysis is whether the loss of the land under the footprint of any earth bund is included as a 'cost'. In all of the examples the bund fell within an area which was ultimately sold to a homeowner as part of a site, or was within an area close to the State Highway which was unlikely to have been developed for residential use regardless - so the loss of the land under the bund has not been included as a cost. As an example, for the development with approximately 50 affected dwellings, if the cost of the land under the bund was included in the analysis, the total cost as a percentage of the likely final value of each of the affected sections would increase from 3 % to 16 %.

We trust this is of assistance. If you have any queries, please do not hesitate to contact us.

Kind Regards



Clare Dykes
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Senior Acoustic Engineer
Acoustic Engineering Services Ltd

Attachment 4: Technical Basis of Model and Data Smoothing



Memo

To:	Stephen Chiles	Job No:	1014982
From:	John Carter	Date:	3 May 2021
cc:	Greg Haldane, Jovanna Leonardo		
Subject:	GIS advice on smoothing of noise contours around the state highway network		

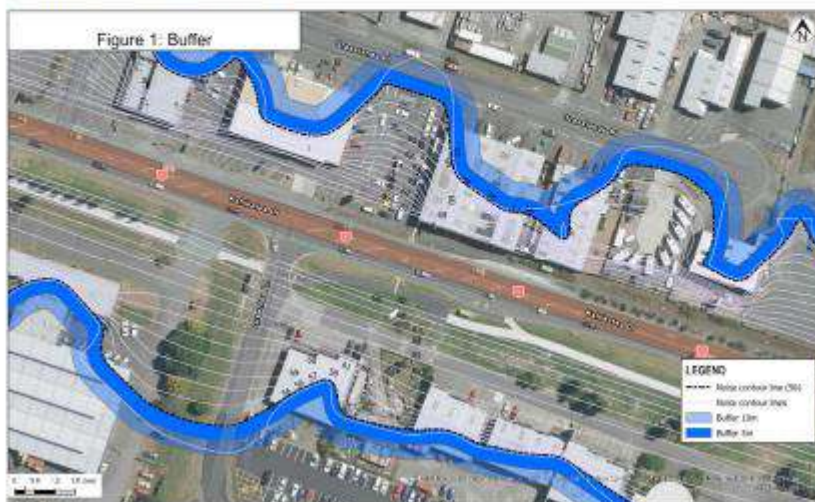
I am writing this memo to provide GIS advice on smoothing of noise contours around the state highway network, as you requested in our meeting on the 15th of April.

There are three main smoothing techniques that could be used to assist your work with Waka Kotahi, in refining rules for acoustic treatment of additions to existing houses or new houses being built near existing state highways. The three most relevant techniques are:

1. Buffer;
2. Simplify; and
3. Smooth.

Buffer

Buffering allows you to set the distance and the side of the line you want to create the buffer around. This is demonstrated in Figure 1 below. The buffer distance in metres can easily be modified based and depending on the distance used, the Figure shows how some of the smaller bends in the noise contour line (the dotted black line) are smoothed by the 5 metre (dark blue) and more so by the 10 metre (light blue) buffers.



Pros:

With buffering you will still keep the general shape of the line and have a consistent distance along the entire contour. This can be easily built into models and automated for the entire country.

Cons:

The negatives of this techniques are you still get some unwanted bends/curves, despite an overall more consistent line. The result of a buffer is an area (polygon), so there are two small steps to convert the polygon into a line, then erase the original line to give one new contour line. The other downside is you push the line out (i.e. needlessly increasing the extent of the contour) in a large proportion of areas where it is already smooth, unlike the smoothing and simplifying methods detailed later in this memo. This can be negated relatively simply by offsetting the line back by buffering the results by the same amount as the original buffer but back towards the original line.

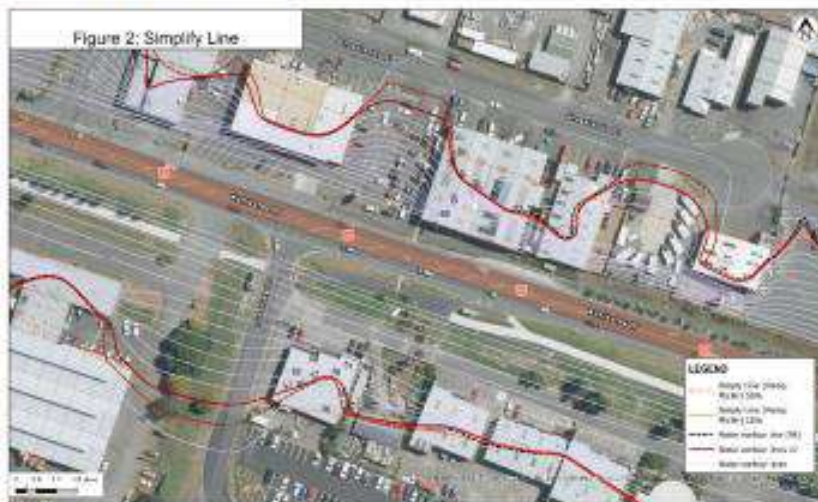
Overall, this is a viable option for your needs, but the main issue would be deciding on the appropriate distance to buffer. Buffering could be used in conjunction with the other methods to provide both a smooth and conservative contour line from the raw modelling results.

As discussed in our meeting, this can be done in ArcGIS, FME and QGIS, but I would only recommend ArcGIS or FME for this task and to allow for integration with automation/existing models. More detail is available from ArcGIS provider ESRI: <https://pro.arcgis.com/en/pro-app/latest/tool-reference/analysis/buffer.htm>.

Simplify Line

Simplify Line simplifies a line by removing points along the line and therefore unwanted bends/curves, while preserving its shape (depending on the degree of simplification set known as *the tolerance*).

There are four available methods, when using ArcGIS Pro, the two most viable for this task are 'Wang-Muller' which retains critical bends and 'Zhou-Jones' which retains the weighted-effective areas. I have included the 'Wang-Muller' method on the 56 dB contour in Figure 2 below, with tolerance set at 10 metres and 50 metres.



The Zhou-Jones method needs lower tolerance set in general, as the results of the simplify tool can vary quite a lot from the original line.

Simplify Line with a Barrier

Simplify Line includes an option of having a barrier, which is another layer or feature can be used to prevent the main simplify line touching or crossing the barrier.

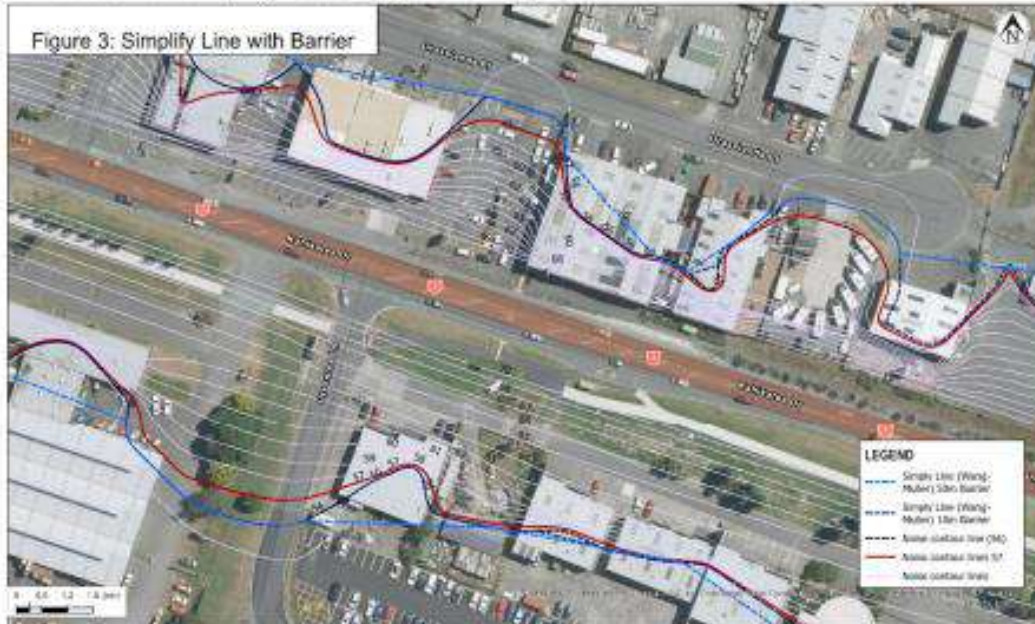


Figure 3 shows how this can be used. The Red line is the decibel (dB) 57 contour, it is included in the method as a barrier, to prevent the simplify line from the 56 dB contour line going across the 57 dB contour. The light Blue line has a tolerance of 50 metres and the dark blue line only has 10 metres tolerance. This should prove very useful when it comes to proving a planning line from noise contours.

Pros:

With simplifying you can set a tolerance to keep very true to the original contour line or really simplify it by setting a higher tolerance to cut out unwanted bends. The barrier should enable more sensible results by preventing modelled results of higher noise to be cut off by smoothing. You will keep the general shape of the line and where the line is already smooth or at least simply the line will match the modelled raw output. This can be easily built into models and automated for the entire country.

Cons

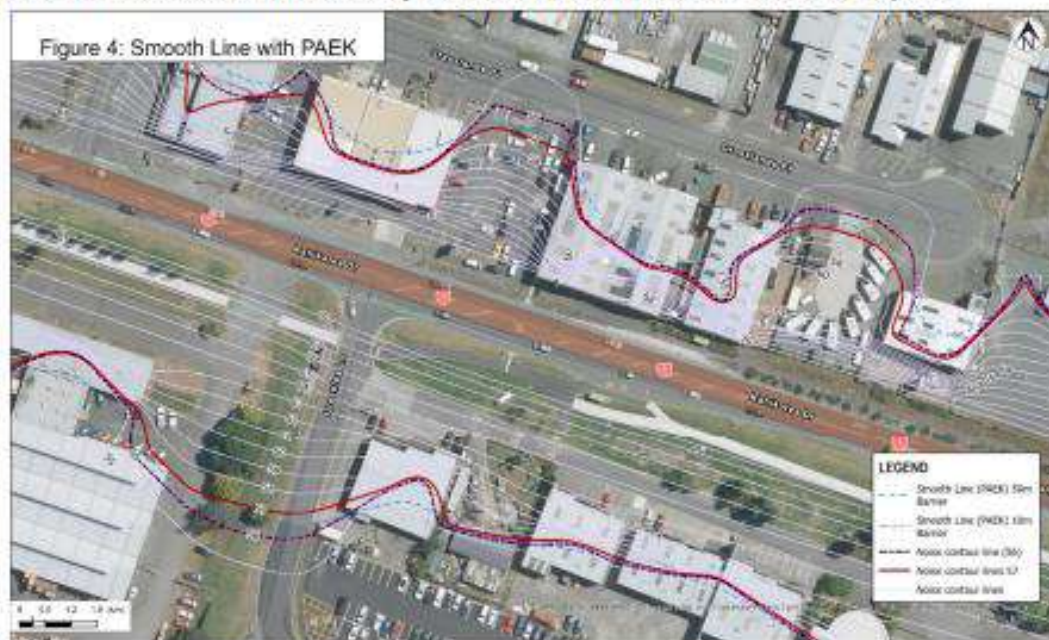
The negatives of this techniques are you still get some unwanted bends, but this can be overcome by adjusting tolerance to suit your wanted outcomes.

Overall, again this is a viable option for your needs, but the main issue would be deciding on the appropriate tolerance distance and barrier location.

More detail is available from ArcGIS provider ESRI: <https://pro.arcgis.com/en/pro-app/latest/tool-reference/cartography/simplify-line.htm>

Smooth Line

Smoothing lines removes the sharper angles with two main methods or algorithms. The Bezier interpolation method and the Polynomial Approximation with Exponential Kernel (PAEK) method. The Bezier method smooths the lines without using a tolerance, so it is not as viable for this task. The PAEK method, which like the simplify line tool allows you to set the tolerance, although the line may actually be more complicated, or have more points along it, which is something to think about for a national dataset. I have demonstrated the results of the PAEK method in Figure 4 below. The tolerance distance in metres can easily be modified based and barriers are also an option.



The Figure shows how the difference in the two tolerance values of 10 metres and 50 metres can vary greatly, where the 50 metre tolerance varies a lot from the original contour line.

Pros:

With smoothing you can keep use barriers and set tolerance. This can be easily built into models and automated for the entire country.

Cons

The negatives of this techniques are you may find it moves too much from the original contour. The valleys/peaks are removed, so you can get an overall more consistent line. The other downside is you again will have to set a tolerance that suits, and the line will move if that tolerance is pushed out or has higher values.

Overall, this could be a viable option for your needs, but the main issue would be deciding on the appropriate distance of tolerance.

As discussed in our meeting, this can be done in ArcGIS, FME and QGIS, but I would only recommend ArcGIS or FME for this task and to allow for integration with automation/existing models. More detail is available from ArcGIS provider ESRI: <https://pro.arcgis.com/en/pro-app/latest/tool-reference/cartography/smooth-line.htm>.

3-May-21

Attachment 5: Other Options Considered

For completeness, Waka Kotahi has also considered methods outside of the district plan to manage the issue; these include both regulatory (Building Code; National Environmental Standard) and private covenants (“no complaints” covenants) and built responses:

Regulatory

The **Building Act** (and Code) currently provides specifications to manage inter-tenancy noise (eg noise between residential apartments within the same building with shared tenancy walls). It does not, however, provide requirements for management of noise generated from outside a building (eg transport noise or nightclub noise from a separate building). A change to the Building Code would be needed to address the issue. While proposals for relevant changes to Clause G6 of the Building Code were circulated in 2016 and remain on MBIE’s work programme, these are not imminent.

A **National Environmental Standard** (NES) would require promulgation by central government, there is no current plan to promulgate RMA-based national planning direction in relation to health and amenity effects relative to transport.

There are situations where **covenants** are entered into where parties acknowledge and accept particular types of effects in return for locating in an area; commonly referred to as “no complaints” covenants. There are a number of limitations with this approach:

- a. it does not remove the actual effects on health and amenity therefore does not address the matters within Part 2 of the RMA;
- b. it is reliant on both parties coming to agreement;
- c. application of a covenant requires a ‘trigger’ to commence negotiations (eg. a request from a resource consent applicant to undertake works).

The primary limitation is however that it does not address actual health and amenity impacts.

Changes to the Building Act or promulgation of a NES are not directly within the control of Waka Kotahi; covenants require a ‘trigger’, agreement between parties and do not actually address the effects generated. None of these options are preferred.

Built Response

Waka Kotahi has undertaken a preliminary assessment of noise improvements across its network. It estimates a cost of at least \$150M²³ to retrospectively manage noise exposure for approximately 50% of persons exposed to noise above 64 dB $L_{Aeq(24h)}$.

Responses could include retrofitting acoustic barriers and/or installing low noise road surfaces.

Retrofitting noise barriers by motorways by Waka Kotahi has been found to cost in the range of \$4,000 to \$10,000 per linear metre of barrier. Construction of noise fences by individuals or land developers generally have lower costs.

Retrofitting acoustic barriers has a number of limitations:

- available land and/or ground conditions;

²³ Not currently funded.

- potential visual dominance and shading;
- ongoing maintenance costs (eg graffiti, landscape maintenance); and
- may not be effective for buildings of more than one storey.

There are also some benefits:

- for barriers close to buildings (or close to the road) and comprehensively blocking the line-of-sight of sensitive land uses to the state highway carriageway, a reduction of 5-10 dB can be achieved;
- where applied to large land areas, cost of protecting multiple sites will aggregate to be less than cost of protecting a low number of sites;
- reduces the need for individuals building houses to have to consider road noise or to keep windows closed;
- can provide visual screening giving a benefit in reducing both perception of noise and actual noise level; and
- can provide improved amenity for outdoor areas.

A porous asphalt surface (low noise road surface) would be in the order of \$30+/m² (standard two coat chipseal surface would be in the order of \$6/m² to \$10/m²). It cannot generally be laid directly on existing roads, because low noise (asphaltic) road surfaces require stiff underlying pavements, otherwise they fail prematurely. For much of the existing network, laying new asphaltic surfaces therefore first requires rebuilding of the structural pavement, which would increase the cost to over \$100/m². Low noise road surfaces can provide in the order of 5 dB reduction in noise generated from the tyre/road interface (although will not materially alter other sounds such as truck engine/air-braking noise). For traffic at highway speeds this is a meaningful improvement, although is often not sufficient to reduce sound to below guideline values.

Overall, while both built options provide some benefits, both options have significant costs and result in the full cost being borne by the road controlling authority in situations where the noise sensitive activity establishes after the state highway.

FORM 5

Waka Kotahi NZ Transport Agency submission on a notified proposal for the Taupō District Plan Changes 38, 42 & 43 under Clause 6 of Schedule 1 of the Resource Management Act 1991

9 December 2022

District Plan Changes 38-43

Taupō District Council

Private Bag 2005

Taupō Mail Centre 3352

via email: districtplan@taupo.govt.nz

This is a submission on a change proposed to the following plan:

Taupō District Plan

The specific provisions of the proposal that our submissions relate to are:

The Taupō District Plan Changes 38, 42 & 43 to the extent the provisions have the potential to compromise Waka Kotahi NZ Transport Agency (Waka Kotahi) statutory obligations in terms of ensuring an integrated, safe, and sustainable transport system.

The Waka Kotahi submission is:

1. Waka Kotahi is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The statutory objectives of Waka Kotahi are to undertake its functions in a way that contributes to an affordable, integrated, safe, responsive, and sustainable land transport system. Our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice for most daily transport needs.
2. Waka Kotahi has a mandate under the Land Transport Management Act 2003 (LTMA), the Government Roothing Powers Act 1989 (GRPA), and the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS) to carry out its functions in a way that delivers on the transport outcomes set by the government.
3. In the 2021 National Land Transport Programme, Waka Kotahi has allocated investment in the Waikato Region (including the Taupō District) to the improvement, operation and maintenance of the State Highway network, including public transport investment, walking and cycling and transport planning. In addition, Waka Kotahi is a co-funder of the local roading network. Waka Kotahi is therefore a significant investor in the infrastructure required to achieve the land use change and growth anticipated in the Taupō District Plan.

4. Overall, Waka Kotahi has an interest in the Taupō District Plan as a result of its role as a:
 - Transport investor – to maximise effective, efficient and strategic returns for New Zealand;
 - Planner of land transport networks – to ensure the integration of infrastructure and land use so as to support liveable communities and the development of an effective and resilient land transport network for customers;
 - Provide or access to and the use of the land transport system – to shape smart, efficient, safe and responsible transport choices; and
 - Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.
5. The Waka Kotahi submission seeks amendments to the Proposed Taupō District Plan in the following topic areas:
 - Amendments to the signage requirements as they relate to the state highway network,
 - Amendments to the permitted vehicle movements to state highways,
 - Amendments to the permitted number of dwellings per site where access is to a state highway,
 - Amendments to lighting levels in the rural environment; and,
 - Addition of reverse sensitivity provisions as they relate to the state highway.
 - Further assessment of the proposed industrial zones regarding site suitability and transport choice.
6. The changes requested are made to:
 - a. Ensure that Waka Kotahi can carry out its statutory obligations.
 - b. Reduce interpretation and processing complications for decision makers.
 - c. Provide clarity for all plan users.
7. Where a provision is not specified in Table 1 below, Waka Kotahi generally supports the way it is drafted.
8. Waka Kotahi could not gain an advantage in trade competition through this submission.

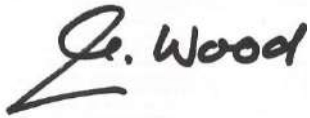
We seek the following decision from the local authority:

- a. Amend the provisions of the Proposed District Plan as detailed in Table 1 (attached) including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Waka Kotahi would like to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

For all correspondence associated with these plan changes please direct this to me, Luke Braithwaite (Planner) at Luke.Braithwaite@nzta.govt.nz and Waka Kotahi Environmental Planning Team at environmentalplanning@nzta.govt.nz.

Signature of person authorised to sign on behalf of Submitter:

A handwritten signature in black ink that reads "Mike Wood". The signature is written in a cursive style with a large, sweeping initial "M".

Mike Wood

Principal Planner

Consents and Approvals

Waka Kotahi NZ Transport Agency

Environmentalplanning@nzta.govt.nz

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Table 1: Decisions Sought on Taupō District Plan Changes 38, 42 & 43

The following table sets out the amendments sought to the Taupō District Plan Changes 38, 42 & 43. Table 2 identifies those provisions that Waka Kotahi supports.

Italics = *Taupō District Plan changes notified text*

Underline, not italics = proposed additions.

Strikethrough, italics = ~~*proposed deletions*~~.

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
Plan Change 38 Strategic Directions 3 - Urban Form and Development	Objective 2.3.2	Support in part	<p>Waka Kotahi supports the integration of infrastructure with land uses, providing for land uses where these are anticipated by long term planning and where land uses are serviced by an appropriate level of infrastructure.</p> <p>However, Waka Kotahi seeks the addition of a provision seeking the reduction in vehicle kilometres travelled to recognise and provide for the NZ Emissions Reduction Plan transport targets through well connected compact urban form and mixed land uses that support this.</p>	<p>Amend as follows:</p> <p><i>1. The district develops in a cohesive, compact and structured way that:</i></p> <p>[...]</p> <p><u>e): reduces vehicle kilometres travelled (VKT) through well connected, compact urban form and mixed land use.</u></p>
	Policy 2.3.3	Support in part	<p>Waka Kotahi supports:</p> <ul style="list-style-type: none"> • the co-ordinated planning of future requirements for infrastructure, • providing for land uses where these are anticipated by long term planning, • discouraging fragmented development, • providing for land uses where the infrastructure has sufficient capacity, • managing subdivision and development where this would give rise to reverse sensitivity effects, and • ensuring there are appropriate multi-modal links. <p>However, Waka Kotahi considers that there is an opportunity to amend the wording of this policy to better provide for growth where this provides for better transport choices.</p>	<p>Amend as follows:</p> <p><i>2. Planning and development in urban environments will positively contribute to well-functioning urban environments including through providing a mix of land uses and multi modal transport choice with a focus on active and public transport.</i></p>
	Policy 2.4.3	Support in part	<p>Waka Kotahi supports this policy seeking subdivision and land use activities to result in positive climate change outcomes.</p>	<p><i>3. Urban and built development must be designed in a manner which considers the need to reduce both</i></p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>However, Waka Kotahi seeks the addition of a provision seeking the reduction in vehicle kilometres travelled to recognise and provide for the NZ Emissions Reduction Plan transport targets through well connected compact urban form and mixed land uses that support this.</p>	<p><u>vehicle kilometres travelled (VKT) and greenhouse gas emissions associated with that development and resulting land use.</u></p>
<p>Plan Change 42 – General Rural Environments</p> <p>Rules and Standards – General Rural Environment</p>	<p>Rule 4b.1.3</p>	<p>Support in Part</p>	<p>Waka Kotahi supports providing for temporary activities, however, does not support this providing for activities where this is able to exceed all performance standards including vehicle movements.</p> <p>Waka Kotahi generally requires either access upgrades or temporary traffic management where vehicle movements are anticipated to be significant and impact on the safe and efficient functioning of the state highway.</p> <p>Waka Kotahi therefore seeks that any temporary activity located on a state highway shall not exceed a trip generation of 100 equivalent car movements per day.</p>	<p>Amend Provision:</p> <p><i>Any temporary activity, being an activity of up to a total of four operational days in any 6-month period, which exceeds any performance standard(s), is a permitted activity, provided that:</i></p> <ul style="list-style-type: none"> a) <i>There are no new permanent structures constructed; and</i> b) <i>Once the activity has ceased, the site (including vegetation and the surface of the ground of the site) is retained or re-instated to its condition prior to activity commencing, and</i> c) <i>An allowance of 14 non-operational days in any six month period associated with the activity is not exceeded; and</i> d) <u>Where access is reliant on a State highway, vehicle movements do not exceed 100 'equivalent vehicle movements' per day.</u>
	<p>4b.1.11</p>	<p>Support</p>	<p>The Waka Kotahi submission seeks to introduce new rules as it is noted that there are no rules relating to the control of reverse sensitivity effects that Objective 3b.2.5 and Policy 3b.2.13 seek to control.</p> <p>This will ensure potential adverse effects (including</p>	<p>New Provision:</p> <p>Impose new reverse sensitivity noise rule per Attachment 1 attached to the submission and/or introduce rules that achieve the same outcome for sensitive noise receivers.</p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>conflicts between activities and reverse sensitivity effects) are mitigated.</p> <p>The road network operates 24/7 with variability in traffic. Noise and vibration effects can interrupt amenity and enjoyment, as well as ability to sleep which can have significant impacts on people's health and wellbeing.</p> <p>Appropriate mitigation is critical to ensuring that undue restrictions are not placed on the operation of these transport networks and the health and wellbeing of those residing or otherwise occupying nearby sites is protected.</p> <p>Part 2 of the Act supports the efficient use and development of the road network while also enabling people and communities to provide for their well-being and their health and safety. An appropriate balance needs to be achieved between ensuring the transport network is efficiently utilised and adjacent development can be facilitated, without compromising safety of people and communities.</p> <p>The proposed new rules provide for new or altered buildings within 100 m of the highway boundary, which can achieve the required internal noise standard, to be permitted activities. Where windows need to be closed to achieve the desired internal noise levels then ventilation performance is prescribed.</p>	

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>There are no standards for outdoor road noise within the Taupō District Plan General Rural Zone. Waka Kotahi considers that outdoor noise can adversely affect the health, safety and wellbeing of people and communities. As such, Waka Kotahi considers that a new standard needs to be inserted In the Rural Chapter that addresses outdoor noise effects.</p> <p>The mitigation for adverse effects on human health proposed through these provisions reflects that in some circumstances, e.g., residential sites near the transport corridor, requiring a greater setback from the transport corridor boundary as a means of addressing noise and vibration effects may not always be practicable.</p> <p>The rules seek to ensure that building development options can still maximise the use of a site, while at the same time having standards for mitigating noise and vibration effects arising from the transport corridor.</p> <p><i>Note: Waka Kotahi is currently working on more accurate contour models which are likely to reduce the extent of the 100m setback. It is likely that these will be available at the further submission phase. Please refer to Appendix 2 being an assessment of plan provisions to provide for human health and amenity in accordance with section 32 of the Resource Management Act for details regarding our reasoning for the amendments</i></p>	

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<i>sought and the modelling versus metric setback sought to be included at the further submission stage.</i>	
4b.2 Performance Standards – General Rural Environment	4b.2.1	Support in Part	<p>Waka Kotahi supports restricting the number of equivalent vehicle movements per day in the General Rural Environment. However, the threshold is considered too high for allotments with access to a state highway.</p> <p>Waka Kotahi generally requires an Integrated Transport Assessment (ITA) for activities that generate over 100 vehicle movements per day as they tend to require site specific access design or intersection treatment in accordance with Austroads Guides. Waka Kotahi then determines whether the access design or intersection treatment is appropriate to ensure the proposed activity does not result in any adverse effects upon the safety and efficiency of the state highway network.</p> <p>Waka Kotahi therefore seeks that any activity located on a state highway route shall not exceed a trip generation of 100 equivalent vehicle movements per day without prior approval of Waka Kotahi.</p>	<p>Amend provision:</p> <ul style="list-style-type: none"> <i>i. 200 'equivalent vehicle movements' per day for the allotment where access is to a local road.</i> <i>ii. Papakāinga - 100 'equivalent vehicle movements' per day for the allotment or 24 per dwelling, whichever is the greater.</i> <i>iii. 100 'equivalent vehicle movements' per day where access is reliant on a State highway.</i> <p><i>EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations where access is to a local road.</i></p>
	4b.2.4	Support in part	<p>Waka Kotahi understands that it is appropriate to have a primary residential unit per site. However, Waka Kotahi does not consider that more than one primary residential unit should be permitted where access is gained from state highways as this does not allow for consideration of traffic effects associated with the dwellings. There are a number of locations where</p>	<p>Amend Provision:</p> <ul style="list-style-type: none"> <i>i. One primary residential unit per 10 hectares.</i> <i>ii. One primary residential unit per site where access is reliant on a state highway.</i> <p><i>EXCEPTION: Papakāinga.</i></p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			intensification of the use of accesses may have adverse safety implications.	
	4b.2.15	Support in Part	<p>Waka Kotahi supports restricting signage in the rural zone including restricting the number, size, type and design of the signage.</p> <p>However, where signage faces a state highway Waka Kotahi seeks further restrictions to ensure that signs visible from the state highway corridor (but not located within it) are safe and appropriate. Waka Kotahi seeks the prevention of signs outside but visible from the state highway that may adversely affect traffic safety and considers that the amendments proposed will result in this outcome.</p>	<p>Amend Provision:</p> <ul style="list-style-type: none"> i. <i>Maximum of one sign per allotment.</i> ii. <i>Maximum total face area of sign - 2m².</i> iii. <i>Signage must relate to the activity undertaken on the allotment.</i> iv. <i>No flashing, reflectorised or illuminated signage.</i> v. <i>One temporary sign per allotment for the sale of land or buildings of not more than 2m² total face area.</i> vi. <u>Where a sign faces a State highway:</u> <ul style="list-style-type: none"> e) <u>the sign must not display more than 6 words, symbols, or graphics and no more than 40 characters.</u> f) <u>Lettering and symbols used must be at least 160 millimetres in height.</u>
	New Provision	Support	<p>Waka Kotahi has identified that there are no lighting restrictions for the General Rural Environment, however there are restrictions for the Rural Lifestyle Environment (Rule 4b.4.12). As such, Waka Kotahi seeks the inclusion of a provision to control the obtrusive effects of lighting in the General Rural Environment.</p> <p>Per Table 3.2 of the Australian New Zealand Standard 4282.2019 the standard on Controlling the Obtrusive Effects of Outdoor Lighting; an A2 Zone (sparsely inhabited and semi-rural areas) should have a maximum artificial light level of 5 LUX.</p>	<p>New Provision:</p> <p><u>4b.2.16 - Maximum Artificial Light Level</u></p> <p><u>5 LUX (lumens per square meter) at the boundary.</u></p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
General Rules – Rural Lifestyle Environment	4b.3.5	Support in part	<p>Waka Kotahi supports providing for temporary activities, however, does not support this providing for activities where this is able to exceed all performance standards including vehicle movements.</p> <p>Waka Kotahi generally requires either access upgrades or temporary traffic management where vehicle movements are anticipated to be significant and impact on the safe and efficient functioning of the state highway.</p> <p>Waka Kotahi therefore seeks that any temporary activity located on a state highway shall not exceed a trip generation of 100 equivalent car movements per day without the prior approval of Waka Kotahi.</p>	<p>Amend Provision:</p> <p><i>i. Any temporary activity, being an activity of up to a total of four operational days in any 6-month period, which exceeds any performance standard(s), is a permitted activity, provided that:</i></p> <p><i>a. There are no new permanent structures constructed; and</i></p> <p><i>b. Once the activity has ceased, the site (including vegetation and the surface of the ground of the site) is re-instated to its condition prior to the activity commencing; and</i></p> <p><i>c. An allowance of 14 non-operational days in any six month period associated with the activity is not exceeded.</i></p> <p><u><i>d. Where access is reliant on a State highway, vehicle movements do not exceed 100 equivalent vehicle movements per day.</i></u></p>
	4b.3.7	Support	<p>The Waka Kotahi submission seeks to introduce new rules as it is noted that there are no rules relating to the control of reverse sensitivity effects that Objective 3b.2.5 and Policy 3b.2.13 seek to control.</p> <p>This will ensure potential adverse effects (including conflicts between activities and reverse sensitivity effects) are mitigated.</p> <p>The road network operates 24/7 with variability in</p>	<p>New Provision:</p> <p>Impose new reverse sensitivity noise rule per Attachment 1 attached to the submission and/or introduce rules that achieve the same outcome for sensitive noise receivers.</p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>traffic. Noise and vibration effects can interrupt amenity and enjoyment, as well as ability to sleep which can have significant impacts on people's health and wellbeing.</p> <p>Appropriate mitigation is critical to ensuring that undue restrictions are not placed on the operation of these transport networks and the health and wellbeing of those residing or otherwise occupying nearby sites is protected.</p> <p>Part 2 of the Act supports the efficient use and development of the road network while also enabling people and communities to provide for their well-being and their health and safety. An appropriate balance needs to be achieved between ensuring the transport network is efficiently utilised and adjacent development can be facilitated, without compromising safety of people and communities.</p> <p>The proposed new rules provide for new or altered buildings within 100 m of the highway boundary, which can achieve the required internal noise standard, to be permitted activities. Where windows need to be closed to achieve the desired internal noise levels then ventilation performance is prescribed.</p> <p>Enhancements to buildings are best achieved at the time of construction. The further removed from the road corridor a building is, the less additional mitigation may</p>	

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>be required. The noise level proposed is in accordance with World Health Organisation standards.</p> <p>There are no standards for outdoor road noise within the Taupō District Plan Rural Lifestyle Environment. Waka Kotahi considers that outdoor noise can adversely affect the health, safety and wellbeing of people and communities. As such, Waka Kotahi considers that a new standard needs to be inserted In the Rural Chapter that addresses outdoor noise effects.</p> <p>The mitigation for adverse effects on human health proposed through these provisions reflects that in some circumstances, e.g., residential sites near the transport corridor, requiring a greater setback from the transport corridor boundary as a means of addressing noise and vibration effects may not always be practicable.</p> <p>The rules seek to ensure that building development options can still maximise the use of a site, while at the same time having standards for mitigating noise and vibration effects arising from the transport corridor.</p> <p><i>Note: Waka Kotahi is currently working on more accurate contour models which are likely to reduce the extent of the 100m setback. It is likely that these will be available at the further submission phase. Please refer to Appendix 2 being an assessment of plan provisions to provide for human health and amenity in accordance</i></p>	

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<i>with section 32 of the Resource Management Act for details regarding our reasoning for the amendments sought and the modelling versus metric setback sought to be included at the further submission stage.</i>	
4b.4 Performance Standards – Rural Lifestyle Environment	4b.4.1	Support in part	<p>Waka Kotahi supports restricting the number of equivalent vehicle movements per day in the Rural Lifestyle Environment. However, the threshold is considered too high for allotments with access to a state highway.</p> <p>Waka Kotahi generally requires a higher standard of access for activities that generate over 30 equivalent vehicle movements per day. Waka Kotahi then determines whether the access design or intersection treatment is appropriate to ensure the proposed activity does not result in any adverse effects upon the safety and efficiency of the state highway network.</p> <p>Waka Kotahi therefore seeks that any rural lifestyle activity located on a national or regional route shall not exceed a trip generation of 30 equivalent car movements per day.</p>	<p>Amend Provision:</p> <p><i>4b.4.1 Vehicle movements</i></p> <ol style="list-style-type: none"> <i>i. 50 equivalent vehicle movements per day for the allotment.</i> <i>ii. <u>30 equivalent vehicle movements per day for the allotment where access is gained from a state highway.</u></i> <i>iii. Papakāinga: 100 vehicle movements per day for the allotment or 24 per dwelling, whichever is the greater.</i> <p><i>EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations where access is to a local road.</i></p>
	4b.4.4	Support in part	<p>Waka Kotahi understands that it is appropriate to have a primary residential unit per site. However, Waka Kotahi does not consider that more than one primary residential unit should be permitted where access is gained from state highways as this does not allow for consideration of traffic effects associated with the dwellings. There are a number of locations where</p>	<p>Amend Provision:</p> <ol style="list-style-type: none"> <i>i. One residential unit per two hectares.</i> <i>ii. One residential unit per four hectares for lots adjoining the General Rural Environment.</i> <i>iii. <u>One primary residential unit per site where access is reliant on a state highway.</u></i> <p><i>EXCEPTION: Papakāinga.</i></p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			intensification of the use of accesses may have adverse safety implications.	
	4b.4.10	Support in part	<p>Waka Kotahi supports restricting signage in the rural zone including restricting the number, size, type and design of the signage.</p> <p>However, where signage faces a state highway Waka Kotahi seeks to ensure that signs visible from the state highway corridor (but not located within it) are safe and appropriate. Waka Kotahi seeks the prevention of signs outside but visible from the state highway that may adversely affect traffic safety and considers that the amendments proposed will result in this outcome.</p>	<p>Amend Provision:</p> <ul style="list-style-type: none"> i. <i>Maximum one sign per allotment.</i> ii. <i>Maximum total face area - 1m².</i> iii. <i>Signage must relate to the activity undertaken on the allotment.</i> iv. <i>No flashing, reflectorised or illuminated signs.</i> v. <i>One temporary sign per allotment, 2m² total face area, for the sale of land or buildings.</i> vi. <u>Where a sign faces a state highway:</u> <ul style="list-style-type: none"> a) <u>the sign must not display more than 6 words, symbols, or graphics and no more than 40 characters.</u> b) <u>Lettering and symbols used must be at least 160 millimetres in height.</u>
	4b.4.12	Support in Part	Waka Kotahi supports controlling the obtrusive effects of lighting; however, the proposed lighting level is not consistent with Table 3.2 of the Australian New Zealand Standard 4282.2019 the standard on Controlling the Obtrusive Effects of Outdoor Lighting. For an A2 Zone (sparsely inhabited and semi-rural areas) this identifies an appropriate lighting level of 5 LUX.	<p>Amend Provision:</p> <ul style="list-style-type: none"> i. <u>8 5 LUX (lumens per square meter) at the boundary.</u>
Plan Change 43 - Taupō Industrial Zone		Support in part	Waka Kotahi appreciates that that the Taupō Future Industrial Land Option Economic Multi-Criteria Analysis 2022 indicates that there is a shortfall in industrial land supply.	<p>Waka Kotahi seeks for the following relief:</p> <p>For an assessment to be undertaken as to how Site 4 and Site 7 will align with the Waikato Regional Policy Statement - Change 1, the NZ Emissions Reduction</p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>However, Waka Kotahi considers that not enough investigation has been undertaken against key documents to show the suitability of this rezoning with specific regard to:</p> <ul style="list-style-type: none"> • The Proposed Waikato Regional Policy Statement Change 1 - Appendix 13 which addresses the approach to out of sequence and unanticipated developments in non-Future Proof Tier 3 authorities. • The NZ Emissions Reduction Plan which sets out key aspects of the planning and infrastructure systems that are needed to support positive climate outcomes. Transport Targets 1 (reduce VKT) & 3 (reduce emissions from freight transport) are particularly relevant to this plan change. <p>In addition, in order for these two locations (particularly Site 4 - Broadlands) to be considered suitable for rezoning as industrial land, further evaluation of the ability to reduce VKT and service the sites with active and public transport should be undertaken given the Transport Assessment identifies these sites as poor (Site 7) and very poor (Site 4) in regard to walking and cycling connections.</p>	<p>Plan, reduction in vehicle kilometres travelled (VKT) and the provision of active and public transport.</p> <p>Subject to the assessments indicating that these measures can be achieved, provision should be made through the rules/standards to ensure delivery of these measures for Site 4 and Site 7.</p>

Table 2: Provision of Taupō District Plan Changes 38 & 42 That Waka Kotahi Supports

The following table identifies those provisions of Plan Change 38 & 42 that are supported because they align with our statutory objectives and resulting in an affordable, integrated, safe, responsive, and sustainable land transport system; or these align with our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice for most daily transport needs.

Chapter	Plan Provision	Support / Oppose	Relief Sought
Plan Change 38 Strategic Direction 4 -Climate Change	Objective 2.4.2	Support	Retain as notified.
Strategic Direction 5 -Significant and Local Infrastructure	Objective 2.5.2	Support	Retain as notified.
	Policy 2.5.3	Support	Retain as notified.
Plan Change 42 – General Rural Environments	Objective 3b.2.3	Support	Retain as notified
	Objective 3b.2.5	Support	Retain as notified.
	Objective 3b.2.6	Support	Retain as notified.
	Policy 3b.2.9	Support	Retain as notified
	Policy 3b.2.10	Support	Retain as notified

Chapter	Plan Provision	Support / Oppose	Relief Sought
	Policy 3b.2.11	Support	Retain as notified.
	Policy 3b.2.13	Support	Retain as notified.
	Policy 3b.2.14	Support	Retain as notified.
	Policy 3b.2.15	Support	Retain as notified.
Rural Lifestyle Environment	Objective 3b.3.1	Support	Retain as notified.
	Objective 3b.3.2	Support	Retain as notified.
	Objective 3b.3.3	Support	Retain as notified.
	Objective 3b.3.5	Support	Retain as notified.
	Policy 3b.3.9	Support	Retain as notified.
	Policy 3b.3.12	Support	Retain as notified.
4b.2 Performance Standards – General Rural Environment	4b.2.7	Support	Retain as notified.
4b.4 Performance Standards – Rural Lifestyle Environment	4b.4.5	Support	Retain as notified.
4b.5 Subdivision Rules – General Rural Environment	4b.5.1	Support	Retain as notified.

Appendix One:

Impose new reverse sensitivity noise rule as follows:

1. Permitted Activity Rule

At any point within 100 metres from the edge of a state highway carriageway and which receives more than 57 dBLAeq(24h) transport noise:

Advice Note: Waka Kotahi holds information which can confirm whether the proposed location of noise sensitive activity will receive more or less than 57 dBLAeq(24h). Where Waka Kotahi confirms that the proposed location of a noise sensitive activity will be less than 57 dBLAeq(24h), the following rules do not apply.

Outdoor road noise

- 1) Any noise sensitive activity with a noise sensitive room in a new building, or alteration to an existing building, that contains an activity sensitive to noise where there is a noise barrier at least 3 metres high which blocks the line-of-sight to the road surface from all points 1.5 metres above ground level within the proposed notional boundary.

Indoor road noise

- 2) Any noise sensitive activity with a noise sensitive room in a new building, or alteration to an existing building, that contains an activity sensitive to noise where the building or alteration is:
 - a) Designed, constructed and maintained to achieve indoor design noise levels resulting from the road not exceeding the maximum values in Table 1; or
 - b) At least 50 metres from the carriageway of any state highway and is designed so that a noise barrier entirely blocks line-of-sight from all parts of doors and windows to the road surface.

Table 1

Occupancy/activity	Maximum road noise level $L_{Aeq}(24h)$
<i>Building type: Residential</i>	
Sleeping spaces	40 dB
All other habitable rooms	40 dB
<i>Building type: Education</i>	
Lecture rooms/theatres, music studios, assembly halls	35 dB
Teaching areas, conference rooms, drama studios, sleeping areas	40 dB
Libraries	45 dB
<i>Building type: Health</i>	
Overnight medical care, wards	40 dB
Clinics, consulting rooms, theatres, nurses' stations	45 dB
<i>Building type: Cultural</i>	
Places of worship, marae	35 dB

Mechanical ventilation

- 3) If windows must be closed to achieve the design noise levels in clause 2(a), the building is designed, constructed and maintained with a mechanical ventilation system that:
 - a) For habitable rooms for a noise sensitive activity, achieves the following requirements:

- i. Provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and
 - ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and
 - iii. provides relief for equivalent volumes of spill air; and
 - iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18CC and 25CC; and
 - v. does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.
- b) For other spaces, is as determined by a suitably qualified and experienced person.

Indoor road vibration

- 4) Any noise sensitive activity with a noise sensitive room in a new building or alterations to existing buildings containing a noise sensitive activity, closer than 40 metres to the carriageway of a state highway, is designed constructed and maintained to achieve road vibration levels not exceeding 0.3mm/s vw.95.

Design report

- 5) A report is submitted by a suitably qualified and experienced person to the council demonstrating compliance with clauses (1) to (4) above (as relevant) prior to the construction or alteration of any building containing a noise sensitive activity. In the design road noise is based on measured or predicted noise levels plus 3 dB.

2. Restricted Discretionary Activity Rule

Any new or altered noise sensitive activity which does not comply with Permitted Activity Rule.

Restricted Discretionary Activity – Matters of Discretion

Discretion is restricted to:

- (a) Location of the building;
- (b) The effects of the non-compliance on the health and amenity of occupants;
- (c) Topographical, ground conditions or building design features that will mitigate noise or vibration effects; and
- (d) The outcome of any consultation with the NZ Transport Agency.

Restricted Discretionary Activity – Assessment Criteria Discretion is restricted to:

- (a) Whether the location of the building minimises effects;
- (b) Alternative mitigation which manages the effects of the non-compliance on the health and amenity of occupants;
- (c) Any identified topographical, ground conditions or building design features that will mitigate noise and vibration effects or; and
- (d) The outcome of any consultation with the NZ Transport Agency.

Appendix 2: Assessment of Plan Provisions to Provide for Human Health and Amenity in accordance with section 32 of the Resource Management Act



First name: Alana

Last name: Delich

On behalf of:
Taupō Climate Action Group

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Suburb:

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Postcode: 3330

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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

If required, TCAG is happy to present a combined oral submission with other individuals or groups with similar concerns.

Attached Documents

File

TCAG Submission to DP Changes 9 Dec 2022 Final draft

Taupō Climate Action Group (TCAG) Draft Submission to TDC DP Changes 38-43

9 December 2022

Plan Change 38 - Strategic Directions

We strongly support the inclusion of Climate change as strategic Direction 4 for the Taupō District Plan. However, we believe that the objectives are not strong enough to drive low emissions development in our district.

For example, proposed 2.4.2 Objective 1. *"Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes."*

- We ask that this objective could be made stronger to state "Subdivision, use and development of land in the Taupō District will minimise greenhouse gas emissions and result in positive climate change outcomes."
- We ask that the wording in the climate change strategic direction 4 be consistent with new legislation, including the NPSUD and Natural and Built Environment Bill which have stronger statements including, supporting reduction in greenhouse gas emissions and are resilient to current and future effects of climate change and the reduction in risks arising from, and better resilience.

Regarding Policy 2.4.3 (2) – *land use activities which unduly accelerate effects of climate change will be discouraged.*

We ask how this will be discouraged through the District Plan and whether any additional rules or other methods are proposed in order to discourage this?

Regarding Policy 2.4.3 (3) – *subdivision, use and development must demonstrate resilience to the effects of climate change over time.*

We ask what rules or methods will be used to require this to be demonstrated by subdivision proposals and development? There are no objectives, policies, rules or other methods relating to these climate change matters in the District Plan at present. Objectives, policies, rules and methods may need to be added to other chapters of the District Plan in order for this strategic direction to be effective and to provide clarity on what is actually required. [RH1]

Regarding Policy 2.4.3(4) - Urban and built development must be designed in a manner which considers the need to reduce greenhouse gas emissions associated with that development and resulting land use.

We ask how will this be measured? We note that the newly adopted TDC Emissions Reduction Targets & Directive has targets that are in-line with current national emissions budgets and 2050 targets. For instance, procurement, including in relation to subdivision and development, is an area where greenhouse emissions can be effectively reduced.

- We seek that the Strategic Directions clarify how an energy audit and/or emission budget will be required for a change of land use or for new developments in the urban area and Taupo Town Centre.
- We ask that the Strategic Directions are more specific as to how developments include and demonstrate measures to reduce carbon.
- We ask that Strategic Direction 4. provide more clarity regarding methods for reducing emissions in line with TDC's Emissions Reduction Targets & Directives.

2.3 Strategic Direction 3 Urban Form and Development

- TCAG support this section in principle

- TCAG seek objectives and policy to be included relating to preserving and enhancing biodiversity in the urban zones (this also relates to climate change objectives above & '2.3.3 5. *Support subdivision, use and development of land that will lead to beneficial social and cultural outcomes for the District's community.*')

2.6 strategic Direction 6 Natural environment values.

The Taupō district is one of few districts in New Zealand to contain rare and unique geothermal ecosystems, yet our Significant geothermal features have not been recognised in this strategic direction.

- We seek specific recognition of significant geothermal features in the preamble to the strategic direction.
- We seek an additional objective: "The protection of significant geothermal features from inappropriate land use and development which may adversely affect these unique ecosystems."

Plan Change 39 - Residential Building Coverage

We are concerned that the increase in residential building coverage from 30 to 35% will lead to increase in impermeable surfaces within the lake Taupō catchment. Maintaining permeable surface area within the Lake Taupō catchment is important to minimize the loading on stormwater systems. Particularly in a warming climate with more unpredictable rainfall patterns. We note that the maximum site coverage of 50% will not change but that this doesn't actually restrict the amount of non-permeable surfaces on a site (which could be 100%). We feel that increased monitoring will be required to ensure that the increased building footprint does not result in creep in the maximum site coverage.

- We therefore ask that solutions such as permeable driveways are promoted, and that the maximum site coverage of 50% is made enforceable by changing the wording of the maximum building coverage rule to restrict the amount of non-permeable surfacing.

Plan Change 42- General Rural & Rural Lifestyle Environments:

In general, the TCAG supports residential development close to town to minimise travel (Greenhouse gas emissions) and pressure on infrastructure including water supply in a climate stressed world. We understand this preference is in line with TDC's latest Growth Management Strategy.

Ideally rural residential areas would be adjacent to residential developments, for instance a variety of lot sizes in the Nukahau Plan Change would have provided for this. Public transport and active transport can be facilitated close to urban areas in the District.

While we support the Rural Lifestyle rezoning in principle, we are concerned that allowing further subdivision in these areas will increase carbon emissions as there will be increased travel.

Allowing increased vehicle movements from intensified Rural Lifestyle zone does not fit with Strategic Direction 1. '*Subdivision, use and development of land in the Taupo District will result in positive climate change outcomes.*'

- We ask that Rural Lifestyle subdivision be limited to the periphery of existing urban areas, not those identified in the Rural areas.

Further comment: It is likely that the provision for subdivision within a Rural Lifestyle zone but not on the periphery adjacent to the Rural zone, while commendable in terms of amenity, will be problematic as landowners will likely contest their ability to subdivide if their neighbours are able to do this on a similar lot size. I.e. within the zone itself. We foresee issues of precedent being set in these situations and further erosion of the rural amenity and increased lot numbers being enabled over time.

While the formal protection of 4ha of an SNA in the creation of a bonus lot looks good on paper, "formal protection" is merely a legal agreement.

- We suggest the wording "formal protection and enduring ecological management" would create more meaningful environmental outcomes.
- We seek a provision requiring an ecological management plan which includes consideration of weed and animal pest management. This should be submitted as part of the application for a bonus lot.
- In addition, we suggest the inclusion of a Subdivision - Significant Natural Areas section to the effect that: "Any subdivision of land in the General Rural Environment or Rural Lifestyle Environment that is located adjacent to a Significant Natural Area will include a buffer, so as not to encroach on the SNA, and allow for access to that Significant Natural area for on-going ecological management to maintain the ecological integrity of the SNA, including weed and animal pest management."

RE: 4b. Rural Environment

TCAG agrees with WRC's previous comments to the Draft DP that *'development should be situated away from natural gully systems and that gully vegetation should be managed to avoid exacerbating actual or potential erosion (and related) risks. Identification and protection of natural gullies should be mandatory for all development in the district.'*

TCAG commend the council on working with developers in urban areas and support the protection and revegetation of gullies in the district. They can, as is well understood, have multiple benefits, not least as carbon sinks, for stormwater attenuation, recreational use but also serve as invaluable ecological corridors in urban as well as rural areas.

- TCAG request consideration be given to natural gully systems in the General Rural Environment and proposed Rural Lifestyle Zone including general protection, restricted land use in close proximity to, restricted or controlled access, vegetation enhancement and management, erosion control.

Comment: We understand that identifying gullies would be possible via a GIS analysis process. This is well within the capability of Taupō District Council particularly given that there are significant LiDAR datasets currently being processed by LINZ as part of the Elevation Aotearoa programme.

Plan change 43: Taupo Industrial Lane

"We encourage caution towards proposed Plan Change 43 – Taupō Industrial Land. In particular the rezoning of the Broadlands Road West Area. This area includes potential areas of un-mapped geothermal habitat, Geothermal ecosystems represent a unique habitat type that cannot be artificially created, and ongoing development of these areas contributes to the decline of these critically endangered ecosystems. Industrial development on the edge of other geothermal areas within the Taupō District has led to damage to these areas due to dumping, vehicle access and fires.

Development of the Broadlands Road site requires conditions contributing to the restoration of the adjoining geothermal systems, in order to halt the “death by one thousand cuts” of these critically endangered ecosystems.

We ask that provisions include, but not be limited to:

- the inclusion of an ecological assessment of potential geothermal features,
- an ecological mitigation plan and
- a hydrological assessment of effects of development on groundwater recharge.

We also question the inclusion of the site at 189 Napier Road from Rural to Industrial as inconsistent with 2.4 Strategic Direction Climate Change, where there is already a large industrial area opposite this site – is this additional industrial land necessary? There is also a new industrial zone near Taupo Airport. Also, a consent for the EUL development includes this site and there is a consent notice relating to the use of this site for education. Has consideration been given to reverse sensitivity from the residential properties which will adjoin this site in the EUL development, and potential for adverse industrial effects for these new residential properties?

- TCAG ask that the Industrial Zone at 189 Napier Road be removed.

We thank TDC for the opportunity to submit and are happy to speak to our submission.

Alana Delich, on behalf Taupō Climate Action Group

Organisation:

Te Kotahitanga o Ngati Tuwharetoa

First name: George**Last name:** Asher**Postal address:****Suburb:****City:****Country:** New Zealand**Email:** geoera@xtra.co.nz**Daytime Phone:** 021 368566

- I could
- I could not

Gain an advantage in trade competition through this submission

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If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
PDF - District Plan Submission - TKNT

Submission by Te Kotahitanga o Ngāti Tuwharetoa (TKNT) on Taupo District Council Plan Changes 38 to 43

Introduction:

TKNT was established in 2017 to receive, manage, hold and administer, and implement to implement the settlement redress on behalf of the 26 hapū of Ngāti Tūwharetoa.

TKNT is the mandated iwi authority for Ngāti Tūwharetoa to act as the representative of Ngāti Tūwharetoa in dealing with the Crown, local and regional authorities, other iwi and other external agencies. Its membership is made up of Te Ariki of Ngāti Tuwharetoa and a delegate and alternate member of each of the 26 hapū of Ngāti Tuwharetoa.

Te Poari Mahi (TPM) is the advisory Board for Te Kotahitanga of Ngāti Tuwharetoa.

This submission is made pursuant to requirements of the Resource Management Act 1991. TKNT acknowledge, however, that comments made in respect of Plan Changes 38 to 43 of the District Plan are heavily influenced by the provisions of the Ngāti Tuwharetoa Claims Settlement Act 2018 (the **Settlement Act**) and the preceding Deed of Settlement, 2017.

Of particular importance to TKNT is that the plan changes reflect the vision and values represented by **Nga Pou e Toru**, three pou or pillars that represent the aspiration of Ngāti Tuwharetoa to ensure a healthy Rohe of Ngāti Tuwharetoa (also known as the Area of Interest of Ngāti Tuwharetoa) that is capable of sustaining the well-being of the whole community.

A key intention of the Settlement Act is to enhance Ngāti Tūwharetoa capability and capacity to achieve beneficial environmental and resource management outcomes for the Taupō catchment and the Rohe of Ngāti Tuwharetoa. To achieve this outcome, it is necessary to ensure that the kawa, tikanga, values and mātauranga of Ngāti Tūwharetoa is respected within the policies and plans that shape the decisions relating to the Taupō catchment.

Te Kōpu ā Kānapanapa

The Ngāti Tūwharetoa Claims Settlement Act 2018 provides for the establishment of a statutory joint committee, **Te Kōpu ā Kānapanapa**, whose function is to:

- restore, protect and enhance the environmental, cultural and spiritual wellbeing of the Taupō catchment
- provide strategic leadership on the sustainable and integrated management of the environment in the Taupō catchment
- provide a mechanism for Ngāti Tūwharetoa to exercise mana and kaitiakitanga over the Taupō catchment in partnership with local government.

The joint committee draws membership from Te Kotahitanga o Ngāti Tūwharetoa, Waikato Regional Council and Taupō District Council.

Te Kōpu ā Kānapanapa is focussed primarily on te taiao restoration, protection, and enhancement within the catchment, however, it must also provide for the health, well-being and prosperity of all members of the community including future generations. These functions embody the intent and meaning set out within the three pillars of **Nga Pou e Toru**.

One of the functions of Te Kōpu ā Kānapanapa is to prepare and approve **Te Kaupapa Kaitiaki**, the high-level plan for the Taupo catchment. Te Kaupapa Kaitiaki gives expression to the vision, objectives, desired outcomes, values, significant issues, and other relevant matters within the Taupo catchment, all matters that Te Kōpu ā Kānapanapa must give effect to.

The statutory requirements of Te Kaupapa Kaitiaki are set out in Sections 181-182 of the Settlement Act. These sections state that, in preparing, reviewing, varying, or changing a regional policy statement, regional plan or district plan (including a proposed policy statement or plan), a local authority must **recognise and provide for** the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki.

RECOMMENDATION 1:

That the objectives and policies of the strategic directions and Plan Changes 38 to 43 recognise and provide for the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki as set out within Section 181 of the Settlement Act.

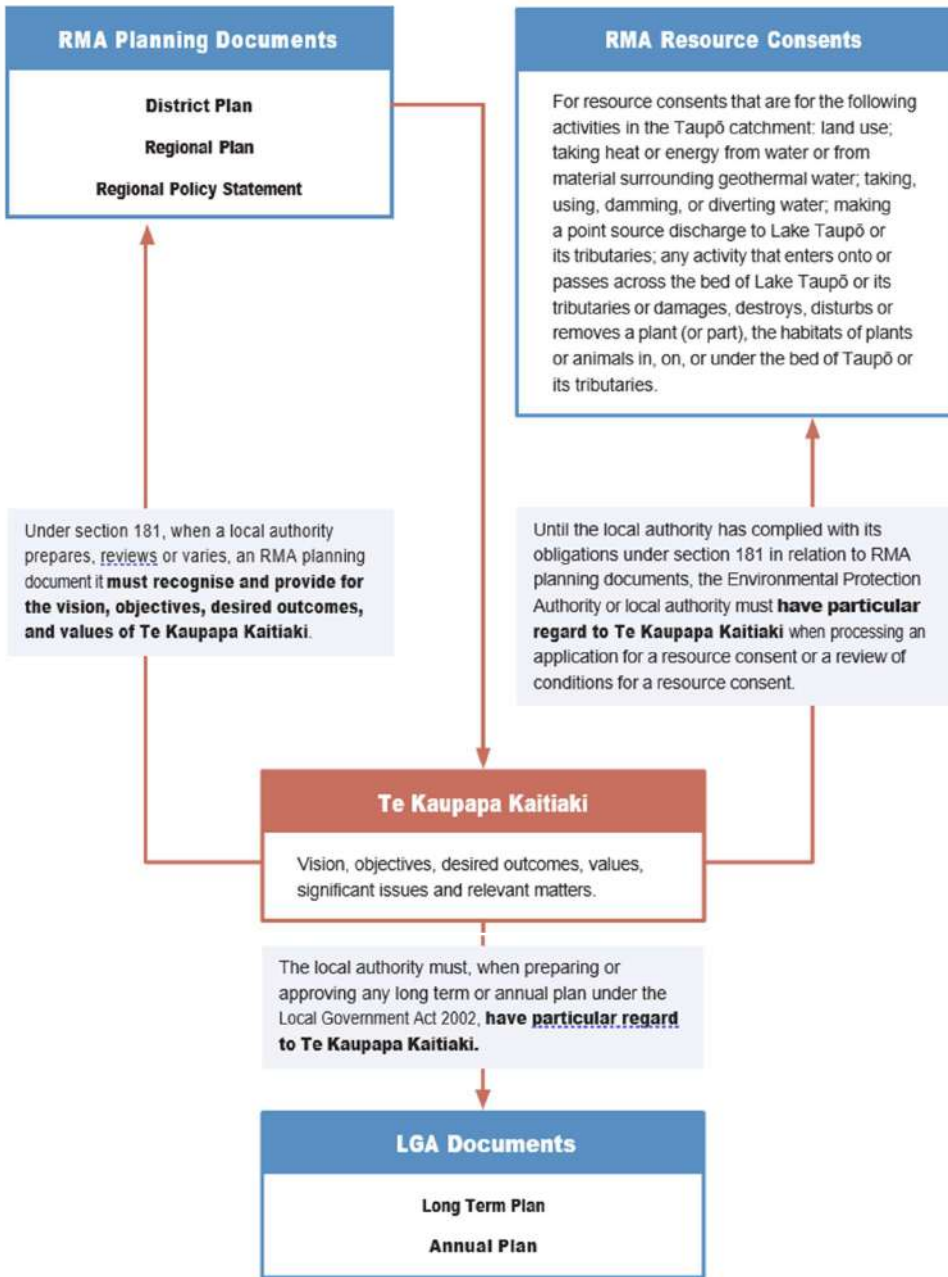
In addition, whenever a consent authority (Taupo District Council) is processing or making a decisions on an application for resource consent (including any review of the conditions of a resource consent) the consent authority must **have particular regard to** the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki. This applies particularly to consents for the following activities, within the Taupō catchment:

- i) using land:
- ii) taking heat or energy from water:
- iii) taking heat or energy from the material surrounding geothermal water:
- iv) taking, using, damming, or diverting water:
- v) making a point source discharge to Lake Taupō or its tributaries:
- vi) any activity that enters onto or passes across the bed of a lake or river or damages, destroys, disturbs or removes a plant (or part), the habitats of plants or animals in, on, or under the bed of Lake Taupō or its tributaries.

Figure 1(below) illustrates the significant requirements of local authorities with respect to Te Kaupapa Kaitiaki.

Figure 1(Reference – *Te Kaupapa Kaitiaki – Taupo Catchment Plan p.15*)

How Te Kaupapa Kaitiaki will affect resource management planning and obligations for local government documents



SUBMISSION SPECIFIC TO PLAN CHANGE 38: STRATEGIC DIRECTIONS:

CHAPTER 2

TKNT note that TDC is required under the RMA to ‘take into account’ of Te Tiriti o Waitangi. TKNT hereby clarifies its preference for the wording of legislation that ensures that local authorities are more respectful and committed to fulfilling Treaty based principles. In this regard, TKNT note that the RMA will largely continue to be applied during the transition of the ‘Reform’ while Regional Spatial Strategies (RSS) and Natural Built Environment Plans (NBE Plan) are being developed within regions. TKNT note that iwi/Maori/ hapu may be exposed to unfair risk and adversity when a local authority makes a choice to not take into account or avoid giving effect to the principles of the Treaty as the RMA Act currently allows. TKNT refer to the several cases that have been before the Waitangi Tribunal since 1992) and ask that TDC when interpreting these Treaty/Te Tiriti, principles, ensure that it fully comprehends the situations/circumstances under consideration. To this end TKNT make the following recommendations:

RECOMMENDATION 2

1. That the content and interpretation of the objectives, policies, rules and performance standards of Plan Changes 38-43 respect and reflect a genuine understanding and commitment to the principles of Te Tiriti/The Treaty of Waitangi.
2. That TDC ensure that the content and interpretation of the objectives and policies of Plan Change 38-43 reflect the new wording of the NBE and SP Acts once these are ratified by the appropriate regional authorities.

2.1 TANGATA WHENUA

TKNT generally support the overall content of **Objective 2.1.2**.

TKNT recommend that the following wording changes be made to the following policies:

RECOMMENDATION 3: TANGATA WHENUA

Recommended changes in **Red Font and strikeouts**:

Policy 2.1.3 :

Recognise and provide for the relationship of Māori/iwi/hapū and their culture and traditions with their ancestral lands, water, sites, wāhi tapu (sacred sites), and other taonga (treasures).

1. Provide for development on Māori land that enables tāngata whenua:
 - a. to **exercise their mana whakahaere and kaitiakitanga** ~~act in a way that is consistent with their~~ **kawa, tikanga and mātauranga** ~~culture and traditions~~

- b. to fulfil **their** cultural, economic and social aspirations, **rights and interests** of ~~these~~ **owners-as mana whenua**
 - c. ~~enhance their ability to exercise kaitiakitanga~~
 - 1. ~~strengthens~~ to enhance their relationships with land, water, significant sites, and wāhi tapu and taonga tuku iho
2. Recognise **and provide for** ~~the importance of~~ mātauranga Māori, kaitiakitanga and tikanga Māori in land use planning and decision making.
 3. Recognise and support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua
 4. **Recognise and provide for the unique role of mana whenua hapū as Kaitiaki at place of nga taonga tuku iho.**
 5. Recognise that ~~the wider constraints on the utilisation and development of~~ Māori land **has been subjected to inequitable historical constraints that unfairly limit the owners options for the utilisation and development of their lands.**
 6. **Promote** and enable the development of Māori Land **consistent with the vision, objectives, values and desired outcomes within Te Kaupapa Kaitiaki and** within the provisions of the plan for the purposes of fulfilling the economic and social aspirations of ~~these~~ Maori land owners.
 7. Provide opportunities for Māori involvement in decision-making and monitoring of the District Plan, resource consents, designations and heritage orders including in relation to sites of significance to Māori and issues of cultural significance.
 8. Recognise, in decision making, the importance of iwi **and/or hapū** environmental management plans in providing important guidance and direction on the sustainable use and development of the environment and natural resources.
 9. Recognise and support **kawa and** the incorporation of **tikanga and** mātauranga Māori **principles** into the **planning,** design, development and/or operation of land use activities.

RECOMMENDATION 4

That TDC agree to include additional objectives in accordance with the requirements of Te Kaupapa Kaitiaki.

2.2 FRESHWATER QUALITY / TE MANA O TE WAI

TKNT note that the objectives contained in this section do not provide explicit recognition of Te Mana o te Wai nor do they reflect the contents of Te Kaupapa Kaitiaki.

RECOMMENDATION 5

That Objective 2.2.2 contain an explicit primary objective reference as provided below.

2.2.2 Objective

That freshwater and water bodies be managed in accordance with the hierarchy and principles of Te Mana o te Wai:

1. To protect its mauri and values so that the water is safe for use for traditional medicinal purposes, for drinking, for taking kai and for swimming.
2. To protect freshwater ecosystems, indigenous species, and trout fisheries.
3. To reflect the vision and objectives of ngā hapū o Tūwharetoa as contained within Te Kaupapa Kaitiaki
4. Subdivision and land use is managed in a way that promotes the positive effects, while avoiding, remedying, or mitigating adverse effects (including cumulative effects) of that development, on the mauri, health and well-being of water bodies, freshwater ecosystems, and receiving environments within the Taupō District.

RECOMMENDATION 6

That TKNT generally support policies 2.2.3 numbers 1-6 and recommend that the following wording/changes be adopted to enhance these further.

That 2 further policies be included as submitted (Policy 2.2.3 - 7. & 8 below).

2.2.3 Policy

1. **Manage** waterbodies in a manner **that enhances the health and well-being** of tāngata whenua, ~~and~~ the wider community and future generations.
2. Decisions, policy and planning reflect an integrated land management or ki uta ki tai approach to water resource management **and** land use planning.
3. Recognise and provide for the vision, objectives, and outcomes in Te Ara Whanui o Rangitāiki (Pathways of the Rangitāiki) and Te Kaupapa Kaitiaki ~~documents~~ and to give effect to Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy for the Waikato River.
4. Recognise the benefits of subdivision, landuse and development activities which will directly contribute to the enhancement of freshwater quality.
5. Manage subdivision, use and development of land in a manner that restores, protects and enhances the mana, mauri, health and wellbeing of the District's lakes, rivers, **springs, wetlands** and all other waterways.
6. **Recognise and provide for** the relationship of tāngata whenua as mana whakahaere, kaitiaki and traditional users of waterbodies ~~is respected, enhanced and supported.~~
7. **Manage freshwater ecosystems to ensure protection of indigenous biodiversity and trout.**
8. **Recognise that freshwater bodies provide for traditional rituals and spiritual, physical and psychological well-being and sustenance.**

2.3 STRATEGIC DIRECTION: 3 - URBAN FORM AND DEVELOPMENT

2.3.2 Objectives

RECOMMENDATION 7

TKNT generally support Objectives 2.3.2

2.3.3 Policy

1. Identify and zone appropriate areas of land for urban purposes to guide the future provision of infrastructure within the Taupō District.
2. Planning and development in urban environments will positively contribute to well-functioning urban environments.
3. Subdivision, use and development of land will be consistent with TD2050 to maximise the efficient use of zoned and serviced urban land and is co-ordinated with the provision of effective infrastructure.

COMMENT

TDC is aware that Ngati Tuwharetoa land owners own a substantial area of land within the Taupo District and many of their descendants desire to maintain their turangawaewae with their whanau and ancestral lands. TKNT is concerned that TD2050 fell short of providing adequate scoping future or even identifying existing residential or kainga developments of Māori landowners. TD2050 has also promoted 'red zone' potential residential development that has failed to be realised and some may never be developed. Also, at least one substantial proposal has failed to receive due attention and development support of local authorities while long established settlements with predominantly Māori residents have failed to attract a reasonable level of infrastructure support and services.

Furthermore, since the completion of the Ngati Tuwharetoa claims settlement, additional land has been received as cultural and commercial redress. At least one significant area of cultural redress lands has the explicit sanction of the Crown and mana whenua for residential use. Other redress properties may fulfil similar uses as kainga.

RECOMMENDATION 8

In view of the reasons outlined above, TKNT does not support Policy 2.3.3 (3), particularly in the statement that, "Subdivision, use and development of land will be consistent with TD2050 to maximise the efficient use of zoned and serviced urban land"...

RECOMMENDATION 9

The following submissions are made in respect of Policy 2.3.3:

4. That the concept ‘fragmented development’ not be used to characterise developments on Māori land or to prohibit or constrain the customary rights of mana whenua in utilising their lands.
5. That ‘limiting criteria’ include explicit criteria sets that provide for adequate protection of freshwater bodies consistent with the requirements under Te Mana o te Wai and Te Kaupapa Kaitiaki.
6. That in addition to the requirement to demonstrate beneficial social and cultural outcomes, explicit consideration be provided for the desired outcomes and values within Te Kaupapa Kaitiaki.
7. That TKNT support this policy and recommend further that TDC express that the provision of Papakāinga for the occupation by mana whenua on their ancestral lands is a fundamental human right.
10. That TKNT generally support Policy 2.3.3 (10) and recommend the addition of specified limits be introduced to prevent the adverse effects of urban development on the health and well-being of te taiao, its ecosystems and to communities including iwi/hapū/whanau within the district and beyond.

2.4 STRATEGIC DIRECTION: 4 - CLIMATE CHANGE**RECOMMENDATION 10**

TKNT note that the Objective 2.4.2 covers a limited scope of domains that may be effected by climate change within the District.

TKNT recommend, that climate change domains and objectives be expanded to include protection and mitigation of the following from climate-induced changes/risks: (Note the *reference below to the concepts highlighted in 1, 2, 3 and 4.*)

1. **He Kura Taiao** – Living Treasures: Freshwater bodies, ecosystems, natural habitats, indigenous biodiversity
 - a. Explanation: Loss of these ‘treasures’ will adversely impact Māori customary practice, cultural identity, social cohesion, and well-being.
2. **Whakatipu Rawa** - Maori Enterprise: Includes all rural enterprises (forestry, agriculture, horticulture) and Māori land developments and actual and potential fishing related ventures
 - a. Explanation: Over 68% of Māori businesses are in the primary sector. Over 80% of Māori land is defined as hilly-to-mountainous and is susceptible to major erosion events such as landslides. Extreme rainfall events trigger erosion that affects a large proportion of these lands. Māori own nearly 70% of commercial forestry plantations in the district. These are vulnerable to climate extremes such as high-intensity storms, droughts and wildfires.

3. **He Oranga Tangata** – Healthy People: As noted by TDC, Māori are disproportionately affected by climate induced change and communities generally are affected.
 - a. The impacts are evidenced through a variety of well-being and health issues that may also be exacerbated by geographic location, socio-economic status, existing health conditions, poor access to health system services and an incapacity to adapt.
4. **Ahurea Māori, Tikanga Māori** – Maori culture and practices: Climate-induced changes to the natural environment in Aotearoa-NZ are expected to fundamentally alter the way Māori interact with that environment, each other, and other communities. There will be direct impact on the following:
 - a. Marae
 - b. Kainga
 - c. Access to Mahinga Kai and availability of species
 - d. Access to and significant landscapes

Reference: *He huringa āhuarangi, he huringa ao: a changing climate, a changing world*
 – Land Care Research/Te Pae o te Maramatanga - 2021)

RECOMMENDATION 11

TKNT Recommend that appropriate policies be prepared and adopted to support the new objectives in Recommendation 10 (above)

2.5 STRATEGIC DIRECTION: 5. SIGNIFICANT AND LOCAL INFRASTRUCTURE

Comment:

While infrastructure provides benefits to the social and economic wellbeing of people, communities and the nation, several aspects of infrastructure have permanently damaged and altered terrestrial, geothermal and freshwater taonga and their ecosystems. The direct and indirect social, cultural economic and spiritual impact on Ngāti Tūwharetoa hapū and whanau and other iwi within the District, has been profound and the effects of infrastructure development continue to adversely impact on hapū as kaitiaki at place and Māori landowners. (Almost all of these incidents are historically recorded and documented cases)

TKNT note, that despite the seriousness of these adverse impacts and their significant actual and potential costs to Maori/iwi/hapu/whanau, they are not referenced in the summary and there is an absence of objectives and policies to highlight and address the risks presented by modern and future infrastructure.

RECOMMENDATION 12

That additional statements, objectives and policies be included in **Section 2.5** to reflect the following:

1. A statement that acknowledges the profound adverse, direct and indirect, social, cultural, economic and spiritual impact that infrastructure (three waters networks and services, transport, communications, energy generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators), has on Ngāti Tūwharetoa hapū and whanau and other iwi within the Taupo District
2. A statement that acknowledges the profound adverse impact that infrastructure has on the taiao, taonga tuku iho and the resultant significant effects that this impact has on the environmental and the social, cultural, spiritual and economic well-being of iwi/hapu/whanau and the community.

RECOMMENDATION 13

1. That the additional objective(s) be included in the sub-section to enable protection of the health and well-being of iwi/hapū/whanau Māori landowners and the community and the health and well-being of te taiao and taonga tuku iho of the Taupo District.
2. That the objectives in 1. (above) are recognised and provided for in decision-making and land use planning.
3. That the proposed Objectives 2.5.2, 1. and 4. be modified as follows:
 1. The ~~wider~~ benefits and strategic importance of nationally and regionally significant infrastructure to the District and wider, ~~including the economic, cultural and social wellbeing of people and communities and for their health and safety~~, are recognised in decision making and land use planning.
(Note that the reference to benefits is already contained in Objective 2).
 4. Local and national transport infrastructure located in the Taupō District ~~protects the health and well-being of te taiao, taonga tuku iho, tangata whenua and the community and~~ operates in a safe and effective manner.
4. That a separate policy be provided acknowledge the risks that infrastructure development and operation has on te oranga o te taiao, te oranga o nga taonga tuku iho, te oranga o te tangata and to enable their protection.
5. That policy 2.5.3 - 1. be modified as follows to reflect the concerns in the statement and the recommended objectives:
 1. Recognise and provide for the national, regional and local benefits of renewable energy generation activities and resources, and transmission activities, in relation to climate change ~~and security of supply, and social, and economic wellbeing of people and communities and for their health and safety.~~
6. That policy 2.5.3 – 4. be deleted and replaced by the following.
 4. That Local and national transport infrastructure located in the Taupō District is planned and constructed in a manner that protects the health and well-being of te taiao, taonga tuku iho, tangata whenua, the community, and operates in a safe and effective manner.
7. That an additional policy statement be included to ensure that appropriate long-term planning and funding capacity is invoked when infrastructure services are being proposed and that local authorities demonstrate that they have considered all alternative options before proposing that Māori land be used as the most suitable option or location for the construction and support of infrastructure services.
8. That local authorities ensure that Maori land is not utilised for infrastructure or related services without the consent of the landowners or their mandated representative(s).

2.6 STRATEGIC DIRECTION: 6. NATURAL ENVIRONMENT VALUES

RECOMMENDATION 14: ACKNOWLEDGMENTS

1. That TDC report the actual statistics pertaining to Māori land within the District and the amount and proportion of Māori land assigned the status of Significant Natural Areas (SNAs) under the latest 2019 proposed SNAs Policy.
2. That TDC report the amount and percentage of private lands other than Māori land, within the District, that is assigned proposed SNAs, the total area of land assigned SNAs status in DOC managed lands.
3. That TDC acknowledge the extraordinary contribution of Māori landowners and hapū (kaitiaki) to the protection of indigenous biodiversity, ecosystem services and to the general health and well-being of Te Taiao and to climate change mitigation and adaptation.

RECOMMENDATION 15

1. Note that TKNT support objectives and policies that protect, enhance and restore significant indigenous ecosystems, habitats and indigenous species from the adverse effects of inappropriate development.
2. TKNT note and acknowledge the extraordinary steps that Ngati Tuwharetoa, Māori landowners and hapū (kaitiaki) have already taken to protect significant natural landscapes, te taiao, biodiversity and precious taonga including waterbodies, prior to the existence of the Resource Management Act 1991 (RMA). Furthermore, these unheralded contributions continue to be of immeasurable benefit for environmental and biodiversity protection and in the creation of a raft of substantial ecosystem services that have been activated throughout the district over many decades. TKNT note that these services have never been adequately evaluated. Furthermore, the land owners who created them have never been rewarded or considered for reward despite their continued, important role in biodiversity enhancement and climate change adaptation and mitigation.
3. TKNT is deeply concerned that the process currently adopted to determine and assign **Significant Natural Areas (SNAs)** is highly objectionable and contradicts the core values and principles of Ngati Tuwharetoa kawa, tikanga and mātauranga. In this regard, the process of identification and assignment has been imposed by force of legislation and without proper consultation processes. Furthermore, the process of assignment fails to provide Māori landowners with equitable choice or capacity to fully evaluate and determine the nature of their relationship and their culture and traditions with their ancestral lands and wāhi tapu and taonga tuku iho.
4. That TKNT support without reservation, the position of Ngati Tuwharetoa landowners and hapū who oppose directly the assignment (proposed or actual) of **Significant Natural Areas (SNAs)** on their lands.
5. TKNT recommend that a Prohibition (or RAHUI) be declared over Maori owned lands to prevent them from being assigned as SNAs without the express consent of the landowners or their mandated representatives, obtained at a properly notified and constituted meeting of the owners.
6. TKNT recommend that TDC, the Crown and appropriate regional authorities confirm acceptance of a Moratorium on SNAs as explained above and invite Māori landowners and Hapu to discuss and agree a fair and equitable process and agenda to re-engage in discussions on Natural Environmental Values.
7. TKNT recommend that these ecosystem services produced by Māori land owners are fully evaluated and a system of rewards is developed to recognise the contribution of the landowners who deliver these services.

AN EXAMPLE OF EARLY LEADERSHIP IN ENVIRONMENTAL STEWARDSHIP – LAKE TAUPO AND ROTOAIRA FOREST TRUSTS.

Lake Taupo Forest (LTF) was established in 1969 and Lake Rotoāira Forest (LRF) in the early 1970s. The total area of both forests was over 48,000 hectares. The Crown (lessee) and Ngati Tuwharetoa landowners (lessor) agreed to prohibit the planting of 28% of LTF and 42% of LRF. These substantial areas represented a significant opportunity cost, however, this outcome was driven by the commitment of the Ariki (Paramount Chief), kaumatua, the owners and hapū leaders through their unconditional commitment to uphold their kawa, tikanga and mātauranga. In the case of Lake Rotoaira, a 600 metre continuous, ‘no plant zone’ was established around its foreshore to enable protection for its waters and its mauri. This has been maintained intact since the initial plantings in 1971. By far, the largest proportion of the set-aside, protected areas were to maintain the orange (well-being) of all freshwater bodies, their ecosystems, habitats, indigenous species and trout. Some riparian ‘protection strips’ exceeded 500 metres in width to ensure that these waterways were fully protected from runoff, siltation, erosion and physical damage. A much smaller proportion of land within the forests was set aside to protect wāhi tapu, sites and landscapes of special importance and related taonga tuku iho (indigenous forests, mahinga kai, kainga settlements).

The obligation to ensure the health and well-being of the land and waters (manāki whenua, manāki wai Māori) and to secure their relationship with their whenua was the first priority of the landowners. Only after this was accomplished, were they comfortable to turn their attention to developing a world class commercial forestry venture. These forests are unique in NZ and globally insofar as they are characterised as multi-purpose forests that demonstrate deliberately designed attributes of water management, climate change mitigation and adaptation, cultural spiritual and social and environmental outcomes as well as fulfilling highly successful commercial objectives. Achieving these multiple goals for thousands of owners in over 140 separate blocks of privately owned Māori land may appear to many to be a formidable challenge, however, its success was in no small way attributed to insightful leadership and an adherence to Ngati Tuwharetoa kawa, tikanga and mātauranga.

SUBMISSION SPECIFIC TO PAPA KĀINGA - PLAN CHANGE 42 – THE GENERAL RURAL AND RURAL LIFESTYLE ENVIRONMENTS.

RECOMMENDATION 16

1. That TKNT support the deletion of the previous definition in the Taupo District Plan for Papakāinga and support the new definition of Papakāinga.
2. That TKNT support the proposal to split the rural environment into two zones, namely the General Rural Environment and the Rural Lifestyle Environment.
3. That TKNT generally support the Proposed Objectives and the Proposed Policy.
4. That TKNT generally commend the progress that has been made by TDC in developing the rural rules affecting Papakāinga, however, TKNT note to TDC that it is in the early stages of developing its kainga programme including Papakāinga and recommends that TKNT, prospective home owners' and TDC hold further discussions prior to the finalisation of detailed rules for Papakāinga.
5. That TKNT note that innovative Papakāinga performance standards are being proposed and implemented in many local authorities in NZ that are not yet available under the proposed TDC performance standards.
6. That in view of its being in the early stages of developing its kainga programme, including Papakāinga, TKNT recommend that prospective home owners' and TDC hold further discussions prior to the finalisation of detailed performance standards for Papakāinga.
7. That TKNT oppose the stringent performance standards proposed for maximum building coverage and recommend that it be increased for Papakāinga.
8. That TKNT oppose the proposed minimum building setbacks of 15m and recommend that consideration be given for prospective Papakāinga owners to reduce their requirements for minimum building setback.
9. TKNT commend TDC for the progressive changes it has made to accommodate Papakāinga in the Taupo District.

George Asher
Te Poari Mahi
Waea: 021 368 566 | Imera: geoera@xtra.co.nz



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First name: Helen

Last name: Brosnan

On behalf of:
Mega Food Services Limited

Postal address: PO Box 165

Suburb:

City: Taupo

Country: New Zealand

Postcode: 3351

Email: helenb@cheal.co.nz

Daytime Phone: 0212071497

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.19 Plan Change 43 - Taupō Industrial Zone

Points: FS203.1

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

We submit that Broadlands Road West should be re-zoned Taupo Industrial.

Council has gone through an options appraisal in 2017 with the Growth Management Strategy where it identified a number of other pieces of land for industrial rezoning, but they have decided to proceed with just these two sites.

Geothermal areas cover much of the Taupo town. Geotechnical testing provides sufficient detail to assess what actual hazards exist on site. We have provided preliminary geotechnical testing report to council during their s42a analysis for them to be satisfied that 63 Broadlands Road is suitable for development. Detailed geotechnical testing will occur at time of building consent.

The Waikato Regional Plan has a setback rule regarding the Geothermal Feature on site. This already provides for sufficient setback from the geothermal feature on site. This setback is 50m and future development will adhere to this rule.

There are no district plan rules (or regional plans rules) requiring that buffers around SNAs are planted. If they were this planting in itself may detract from the SNA. I do note that there are however setback rules from SNAs in some district plans (eg of 5 or 10m) and this may be looked at by TDC when they review their 'District Wide' chapter.

How the hot ground overlay works is that testing is carried out and based on the temperature results land use consent is needed if results exceed certain threshold. It is common in already zoned industrial land for consent notices relating to hot ground hazard or subsidence to be on titles of properties and reduced coverage to be required.

We note that this zone is intended for "light Industrial" not heavy industrial which is located in the Rakaunui Road area. Therefore light commercial and light industrial activity will be permitted activities in this zone.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

29.19

Original Submitter: #46 Chris Marshall (, New Zealand)

Original Point: #46.5 4h Taupō Industrial Environment and Centennial Industrial Environment **Points: FS203.2**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

We note the comments made by Tukairangi Trust and agree that owners of land should act responsibly. Mega Foods Limited purchased the land off Taupo District Council approx 5 years ago and we are not aware of either land owner using the site as dumps and wonder if perhaps the general public have used them for such purpose in the past. Same too for any damage to the SNA adjoining the site.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

46.5

Original Submitter: #46 Chris Marshall (, New Zealand)

Original Point: #46.14 Planning Maps

Points: FS203.3

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

These are issues of concern but not in the scope of a plan change. Fly tipping and damage to SNAs are public nuisance issues and need to be dealt with by the appropriate council monitoring officer.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

46.14

Original Submitter: #62 Alana Delich (72 Hinemoa Avenue, Taupō 3330, Taupo, New Zealand, 3330)

Original Point: #62.1 Plan Change 43 - Taupō Industrial Zone

Points: FS203.4

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

We disagree that additional assessment is necessary as a significant buffer to the SNA has already been provided. Ecological assessment would normally be required when the SNA is on the site where the development will occur. The proposed re-zoned land will be located some distance from the SNA and Geothermal feature. We note that Broadlands Road Reserve has no Geothermal Water Features so therefore a hydrological assessment of the effects of development on groundwater recharge would not be necessary.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

62.1

Original Submitter: #62 Alana Delich (72 Hinemoa Avenue, Taupō 3330, Taupo, New Zealand, 3330)

Original Point: #62.2 Plan Change 43 - Taupō Industrial Zone

Points: FS203.5

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

For any sort of financial mitigation to be considered, actual damage and adverse effect to the SNA would need to be established. Most of the site will remain in rural zoning and only a portion of the site will be zoned industrial, therefore I am not convinced that there will be any adverse effect on the SNA and therefore maintenance of the asset falls to the land owner and other environmental funds that they can apply for.

We note that only 11ha of the owned 20 ha in title Section 14 SO438782 (title) 631309 is proposed Industrial land and therefore sufficient buffer to SNA and geothermal features are already provided.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

62.5

Original Submitter: #89 Ashley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #89.21 Plan Change 43 - Taupō Industrial Zone

Points: FS203.6

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

We believe that sufficient buffer to SNA has been provided. This is not shown very well in the plan change information. However approx 100m buffer has been provided and this will be sufficient to protect the SNA. We note that when the district wide performance standards are reviewed buffers to SNAs can be considered at that stage.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

89.21

Original Submitter: #113 Luke Braithwaite (PO Box 13055, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #113.37 Plan Change 43 - Taupō Industrial Zone

Points: FS203.7

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

The details that NZTA seek form part of an application not a district plan change. Therefore this level of detail is likely to be uncovered when a specific land use is proposed. When an application is needed for land use, assessment against the regional plan can be undertaken at that time and consents sought if needed.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

113.37

Original Submitter: #114 Alana Delich (72 Hinemoa Avenue, Taupo, New Zealand, 3330)
Original Point: #114.16 Planning Maps

Points: FS203.8

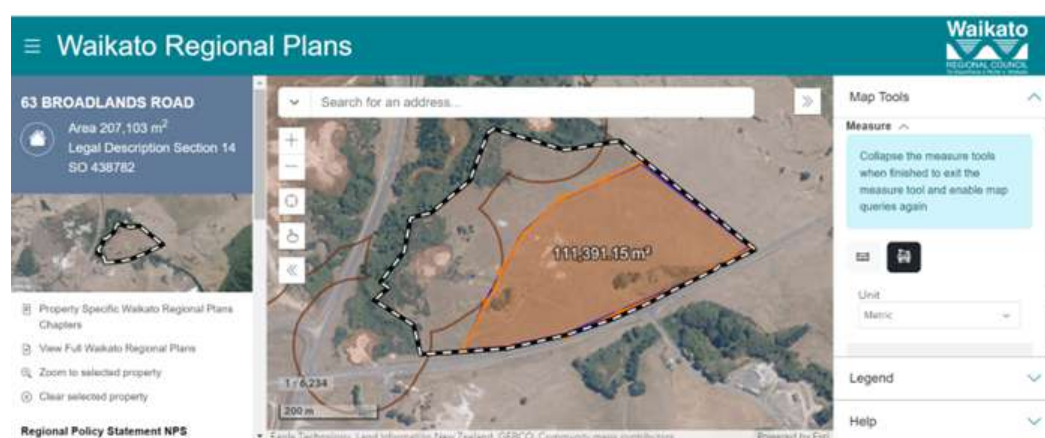
Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

The plan change information does not clearly show the large portion of the Broadlands Road West site that is not proposed for Industrial zoning.

We note that only 11ha of the owned 20 ha in title Section 14 SO438782 (title) 631309 is proposed Industrial land and therefore sufficient buffer to SNA and geothermal features are already provided. Therefore there is sufficient space on site for ground water recharge. See following map showing that the proposed industrial zoned land is not within the regional plan buffer setbacks to the geothermal features.



Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

114.16

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.82 Planning Maps

Points: FS203.9

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:


Support

Regarding 'Broadlands Road West' proposed re-zoning: We note that contact do not want their owned land re zoned. They want their land to remain in rural zone.

We do not oppose this request.

Their request relates to Lot 1 DP 445148, title 563557 which is located to the east of Mega Food Services site.

The following snip from Grip shows the Contact land that this submission point relates to:



Parcel Information

[Marks](#)
[Vectors](#)
[Parcels](#)
[Survey Plans](#)
[Company Data](#)

[Back](#)

Appellation: Lot 1 DP 445148
Address: 263 Broadlands Road, Rotokawa|286
 Centennial Drive, Rotokawa
Land District: South Auckland
Surveyed Area: 224 ha
Calculated Area: 224.2351 ha
Parcel Intent: Fee Simple Title
Parcel Id: 7355768
Parcel Status: Current
Titles: [563557](#) [Grip](#) [LINZ](#)
Owners: Contact Energy Limited

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

93.82

Original Submitter: #93 Mark Crisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.82 Planning Maps

Points: FS203.10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

We note that the remainder of the proposed industrial land should still be zoned Taupo Industrial

This is the land owned by the submitter

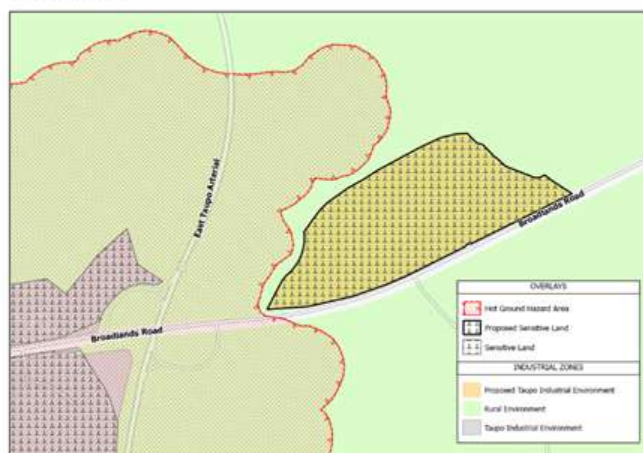


[Back](#)

Appellation: Section 14 SO 438782
Address:
Land District: South Auckland
Surveyed Area: 20.7103 ha
Calculated Area: 20.7251 ha
Parcel Intent: Fee Simple Title
Parcel Id: 7416072
Statute: [Create] Balance fee simple parcel New Zealand Gazette 2013 p 1783
Parcel Status: Current
Titles: [621309](#) [Grip](#) [LINZ](#)
Owners: Jun Foong Chin, Damin Lun, Jing Qiu

and this is a map of the proposed industrial land which includes contact land on the east side

Amend Planning Maps as shown with 'Proposed Taupo Industrial Environment'



Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Keep Mega Food land in industrial plan change (title 621309) and if contact prefer to keep their owned land rural zoned remove their land from the proposed industrial zoning.

Attached Documents

File

No records to display.



First name: Warren
Last name: Ladbrook
Postal address: PO Box 8242
Suburb:
City: Havelock North
Country: New Zealand
Postcode: 4157
Email: warren@apgl.co.nz

Daytime Phone: +6421724044

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter: #19 Gareth Moran (47 Alpha Street, Cambridge, New Zealand, 3434)
Original Point: #19.1 Plan Change 43 - Taupō Industrial Zone

Points: FS208.1

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

- The submission is opposed in its entirety;
- The reasons for opposing the submission are those set out in the submission of APGL (TDC submitter #67). The submission inappropriately downplays the significance of the Land Use Consent and Consent Notice (explained in my submission) that applies to the property, and applies regardless of the ownership of the property. Further, parts of their submission (eg paras 15 and 16) appear to misunderstand that the role of council as a consent authority is entirely separate to council as landowner. That distinction is a very significant one in terms of local authority transparency. The Napier Road site is required to be developed in accordance with the EUL land use consent until and unless that obligation is removed or varied through a future resource management process which council as consent authority (not landowner) will be responsible for. No rezoning should be contemplated until that process is firstly undertaken and unless the outcome of that process is consistent with the application of an Industrial Environment zoning for the site.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

Seek that the entire submission be disallowed

Attached Documents

File

No records to display.



First name: James

Last name: Ryan

On behalf of:
Manawa Energy

Postal address:

Suburb:

City:

Country: New Zealand

Email: james.ryan@manawaenergy.co.nz

Daytime Phone: 0278 2340396

I could

I could not

Gain an advantage in trade competition through this submission

I am

I am not

directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.17 2.2.2 Objective

Points: FS209.1

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.18 2.2.3 Policy

Points: FS209.2

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.19 2.2.3 Policy

Points: FS209.3

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.23 Chapter 2 Strategic Directions

Points: FS209.4

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy in part opposes this submission as renewable electricity generation has a functional and operational need to be in the rural environment and therefore cannot be excluded.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All and add provisions that allow for renewable electricity generation.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.59 Plan Change 38 - Strategic Directions

Points: FS209.5

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy in part opposes this submission as renewable electricity generation has a functional and operational need to be in the rural environment and therefore cannot be excluded.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All and add provisions that provide for renewable electricity generation

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.60 Plan Change 38 - Strategic Directions

Points: FS209.6

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.10 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS209.7

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #46 Chris Marshall (, New Zealand)

Original Point: #46.6 2.4 Strategic Direction 4 Climate Change

Points: FS209.8

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #46 Chris Marshall (, New Zealand)

Original Point: #46.8 2.4.3 Policy

Points: FS209.9

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #46 Chris Marshall (, New Zealand)

Original Point: #46.9 2.4.3 Policy

Points: FS209.10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #95 Joan Forret (Private Bag 3077, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #95.1 Plan Change 38 - Strategic Directions

Points: FS209.11

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #95 Joan Forret (Private Bag 3077, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #95.2 2.1 Strategic Direction 1 Tangata Whenua

Points: FS209.12

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #95 Joan Forret (Private Bag 3077, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #95.6 2.1 Strategic Direction 1 Tangata Whenua

Points: FS209.13

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission. Iwi settlement acts do not provide for a higher order status and iwi documents are only provided for in District planning.andnbsp;

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #95 Joan Forret (Private Bag 3077, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #95.9 2.6 Strategic Direction 6 Natural Environment Values

Points: FS209.14

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission requiring offsetting to be a net gain.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #95 Joan Forret (Private Bag 3077, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #95.14 2.6 Strategic Direction 6 Natural Environment Values

Points: FS209.15

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission, renewable electricity generation has a functional and operational need to be in areas on SNA as that is the location of

the energy resource.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #66 Michelle Phillips (PO Box 162, Reporoa, New Zealand, 3060)

Original Point: #66.2 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai

Points: FS209.16

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.1 2.1.3 Policy

Points: FS209.17

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.2 Plan Change 38 - Strategic Directions

Points: FS209.18

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.3 Plan Change 38 - Strategic Directions

Points: FS209.19

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.4 Plan Change 38 - Strategic Directions

Points: FS209.20

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.5 Plan Change 38 - Strategic Directions

Points: FS209.21

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.6 Plan Change 38 - Strategic Directions

Points: FS209.22

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.7 Plan Change 38 - Strategic Directions

Points: FS209.23

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.8 Plan Change 38 - Strategic Directions

Points: FS209.24

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.9 Plan Change 38 - Strategic Directions

Points: FS209.25

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.10 Plan Change 38 - Strategic Directions

Points: FS209.26

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.11 Plan Change 38 - Strategic Directions

Points: FS209.27

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.12 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points:** FS209.28

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.13 Amendments to the Definitions of the Taupō District Plan Section 10 **Points:** FS209.29

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.14 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.30**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.15 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.31**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.15 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.32**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.16 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.33**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.17 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.34**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.18 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.35**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.19 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.36**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.22 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.37**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.20 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.38**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.21 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.39**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.23 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.40**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.24 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.41**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.27 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.42**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.26 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.43**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.28 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.44**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.29 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.45**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.32 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.46**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.31 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.47**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.33 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.48**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.34 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.49**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.32 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.50**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.35 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.51**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.36 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.52**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.37 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.53**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.38 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.54**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.38 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.55**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.39 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.56**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.40 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.57**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.41 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.58**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.42 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.59**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.43 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.60**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.44 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.61**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.45 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.62**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.46 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.63**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.47 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.64**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.48 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.65**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.49 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.66**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.50 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.67**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.51 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.68**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.52 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.69**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.53 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.70**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.54 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.71**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.55 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.72**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.56 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.73**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.57 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.74**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.58 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.75**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.59 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.76**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.60 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.77**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.61 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.78**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.62 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.79**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.63 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.80**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.64 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.81**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.1 2.3.2 Objectives **Points: FS209.82**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.2 2.3.3 Policy

Points: FS209.83

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.3 2.4 Strategic Direction 4 Climate Change

Points: FS209.84

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.4 2.4.2 Objective

Points: FS209.85

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.5 2.4.3 Policy

Points: FS209.86

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.6 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS209.87

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.7 2.5.2 Objectives

Points: FS209.88

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.8 2.5.3 Policy

Points: FS209.89

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.9 2.6.2 Objectives

Points: FS209.90

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.10 2.6.3 Policy

Points: FS209.91

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.11 Amendments to the Definitions of the Taupō District Plan Section 10 **Points: FS209.92**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.12 3b.1 Introduction

Points: FS209.93

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.13 Objective 3b.2.1 Enable Primary Production

Points: FS209.94

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.14 Objective 3b.2.2 Maintaining the established General Rural character

Points: FS209.95

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.15 Objective 3b.2.3 Rural industry

Points: FS209.96

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.16 Objective 3b.2.4 Other activities

Points: FS209.97

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.17 Objective 3b.2.5 Avoidance of reverse sensitivity

Points: FS209.98

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.18 Objective 3b.2.6 Impacts on infrastructure

Points: FS209.99

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.19 Policy 3b.2.9 Maintaining the established character

Points: FS209.100

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.20 Policy 3b.2.10 Residential units

Points: FS209.101

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.21 Policy 3b.2.12 Minor residential unit

Points: FS209.102

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.22 Policy 3b.2.13 Avoiding reverse sensitivity

Points: FS209.103

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.23 Policy 3b.2.14 Commercial and industrial activity **Points: FS209.104**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.24 Policy 3b.2.15 Allotment size **Points: FS209.105**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.25 Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment **Points: FS209.106**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.26 Objective 3b.3.2 Avoid reverse sensitivity **Points: FS209.107**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.27 Objective 3b.3.3 Commercial and industrial activities

Points: FS209.108

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.28 Objective 3b.3.4 Consolidate rural lifestyle activities

Points: FS209.109

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.29 Objective 3b.3.6 Impacts on community infrastructure

Points: FS209.110

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.30 Policy 3b.3.9 Character of the Rural Lifestyle Environment **Points: FS209.111**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.31 Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment **Points: FS209.112**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.32 Policy 3b.3.12 Minor residential unit **Points: FS209.113**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.33 4b.1.1 Activities in the General Rural Environment **Points: FS209.114**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.34 4b.1.2 Minor residential units

Points: FS209.115

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.35 4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields

Points: FS209.116

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.36 4b.1.5 Commercial and industrial activities, and home businesses, **Points: FS209.117**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.37 4b.1.7 High voltage transmission lines **Points: FS209.118**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

All

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.38 4b.1.8 Buildings within Outstanding Landscape Areas **Points: FS209.119**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.39 4b.1.9 Earthworks within Outstanding Landscape Areas **Points: FS209.120**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.40 4b.2.1 Vehicle movements **Points: FS209.121**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.41 4b.2.9 Maximum Noise - Limits

Points: FS209.122

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.42 4b.2.10 Maximum Noise - Construction Noise

Points: FS209.123

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.43 4b.2.11 Maximum Noise - Electricity Generation Core Sites

Points: FS209.124

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.44 4b.2.13 Maximum Noise - Other

Points: FS209.125

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.45 4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment

Points: FS209.126

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.46 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.127**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.47 Plan Change 38 - Strategic Directions

Points: FS209.128

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.48 Amendments to the Definitions of the Taupō District Plan Section **Points: FS209.129**

10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.49 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.130**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.50 Amendments to the Definitions of the Taupō District Plan Section **Points: FS209.131**

10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.1 Plan Change 38 - Strategic Directions

Points: FS209.132

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.2 Chapter 2 Strategic Directions

Points: FS209.133

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.3 2.1 Strategic Direction 1 Tangata Whenua

Points: FS209.134

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.4 2.1.2 Objective

Points: FS209.135

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.5 2.1.3 Policy

Points: FS209.136

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.6 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai

Points: FS209.137

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.7 2.3 Strategic Direction 3 Urban Form and Development

Points: FS209.138

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.8 2.3.2 Objectives

Points: FS209.139

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.9 2.3.3 Policy

Points: FS209.140

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.10 2.4 Strategic Direction 4 Climate Change

Points: FS209.141

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.11 2.4.2 Objective

Points: FS209.142

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.12 2.4.3 Policy

Points: FS209.143

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.13 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS209.144

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.14 2.5.2 Objectives

Points: FS209.145

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.15 2.5.3 Policy

Points: FS209.146

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.16 2.6 Strategic Direction 6 Natural Environment Values

Points: FS209.147

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.17 2.6.2 Objectives

Points: FS209.148

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.18 2.6.3 Policy

Points: FS209.149

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.19 2.2.2 Objective

Points: FS209.150

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.20 2.2.3 Policy

Points: FS209.151

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.21 2.2.3 Policy

Points: FS209.152

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.22 Plan Change 41 - Removal of Fault lines

Points: FS209.153

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.23 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.154**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.24 Amendments to the Definitions of the Taupō District Plan Section **Points: FS209.155**

10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.25 Amendments to the Definitions of the Taupō District Plan Section **Points: FS209.156**

10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.26 3b.1 Introduction

Points: FS209.157

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.27 Objective 3b.2.1 Enable Primary Production

Points: FS209.158

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.28 Objective 3b.2.2 Maintaining the established General Rural character

Points: FS209.159

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.29 Objective 3b.2.3 Rural industry

Points: FS209.160

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.30 Objective 3b.2.4 Other activities

Points: FS209.161

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.31 Objective 3b.2.5 Avoidance of reverse sensitivity

Points: FS209.162

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.32 Objective 3b.2.6 Impacts on infrastructure

Points: FS209.163

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.33 Policy 3b.2.9 Maintaining the established character

Points: FS209.164

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.34 Policy 3b.2.10 Residential units

Points: FS209.165

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.35 Policy 3b.2.12 Minor residential unit

Points: FS209.166

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.36 Policy 3b.2.13 Avoiding reverse sensitivity

Points: FS209.167

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.37 Policy 3b.2.14 Commercial and industrial activity

Points: FS209.168

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.38 Policy 3b.2.15 Allotment size

Points: FS209.169

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.39 Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment

Points: FS209.170

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.40 Objective 3b.3.2 Avoid reverse sensitivity

Points: FS209.171

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.41 Objective 3b.3.3 Commercial and industrial activities

Points: FS209.172

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.42 Objective 3b.3.4 Consolidate rural lifestyle activities

Points: FS209.173

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.43 Objective 3b.3.6 Impacts on community infrastructure

Points: FS209.174

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.44 Policy 3b.3.9 Character of the Rural Lifestyle Environment

Points: FS209.175

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.45 Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment

Points: FS209.176

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.46 Policy 3b.3.12 Minor residential unit

Points: FS209.177

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.47 4b.1.1 Activities in the General Rural Environment

Points: FS209.178

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.48 4b.1.2 Minor residential units

Points: FS209.179

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.49 4b.1.3 Temporary Activities

Points: FS209.180

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.50 4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields **Points: FS209.181**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.51 4b.1.5 Commercial and industrial activities, and home businesses, **Points: FS209.182**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.52 4b.1.7 High voltage transmission lines **Points: FS209.183**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.53 4b.1.8 Buildings within Outstanding Landscape Areas **Points: FS209.184**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.54 4b.1.9 Earthworks within Outstanding Landscape Areas

Points: FS209.185

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.55 4b.2.1 Vehicle movements

Points: FS209.186

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.56 4b.2.5 Maximum building height

Points: FS209.187

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.57 4b.2.6 Minimum building setbacks

Points: FS209.188

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.58 4b.2.7 Minor residential units

Points: FS209.189

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.59 4b.2.8 Commercial and industrial activities, and home businesses **Points:** FS209.190

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.60 4b.2.9 Maximum Noise - Limits

Points: FS209.191

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.61 4b.2.10 Maximum Noise - Construction Noise

Points: FS209.192

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.62 4b.2.11 Maximum Noise - Electricity Generation Core Sites

Points: FS209.193

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.63 4b.2.12 Maximum Noise - Well Drilling and Testing

Points: FS209.194

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.64 4b.2.13 Maximum Noise - Other

Points: FS209.195

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.65 4b.2.14 Parking, Loading and Access

Points: FS209.196

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.66 4b.2.15 Signage

Points: FS209.197

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.67 4b.5.1 Subdivision - General Rural Environment

Points: FS209.198

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.68 4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment

Points: FS209.199

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.69 4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment

Points: FS209.200

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.70 4b.5.4 Subdivision - Default Activity Status

Points: FS209.201

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.71 4b.5.5 Subdivision resulting in a new public road, or extension of existing public road

Points: FS209.202

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.72 4b.5.6 Subdivision - Other

Points: FS209.203

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.73 4b.5.7 Subdivision - Outstanding Landscape Areas

Points: FS209.204

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.74 4b.5.8 Subdivision - Bonus Lots

Points: FS209.205

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.75 4b.5.9 Subdivision - More than 12 allotments

Points: FS209.206

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.76 Planning Maps

Points: FS209.207

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.77 Plan Change 43 - Taupō Industrial Zone

Points: FS209.208

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.78 Amendments to the Definitions of the Taupō District Plan Section 10 **Points:** FS209.209

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.79 Planning Maps

Points: FS209.210

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.80 Planning Maps

Points: FS209.211

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.81 Planning Maps

Points: FS209.212

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #89 Ashiley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #89.3 2.1 Strategic Direction 1 Tangata Whenua

Points: FS209.213

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #89 Ashiley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #89.4 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai

Points: FS209.214

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #89 Ashiley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #89.1 Plan Change 38 - Strategic Directions

Points: FS209.215

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as there will be a separate process and time-frames for the District Council to implement this NPS-IB if and when it comes into effect.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.3 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai

Points: FS209.216

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.5 2.4 Strategic Direction 4 Climate Change

Points: FS209.217

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.6 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS209.218

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.7 2.6 Strategic Direction 6 Natural Environment Values

Points: FS209.219

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #101 Jane Penton (27 Te Hātepe Avenue, Taupo, New Zealand, 3330)

Original Point: #101.1 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai **Points: FS209.220**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #101 Jane Penton (27 Te Hātepe Avenue, Taupo, New Zealand, 3330)

Original Point: #101.2 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai **Points: FS209.221**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #104 Gurv Singh (PO Box 2628, Wellington, New Zealand, 6140)

Original Point: #104.3 2.2.2 Objective **Points: FS209.222**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.6 2.5.3 Policy

Points: FS209.223

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission - clarification for these terms would be beneficial since there is a large amount of Nationally significant infrastructure and Regional significant infrastructure in the region

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.7 2.5.3 Policy

Points: FS209.224

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.4 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai **Points: FS209.225**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.5 2.2.3 Policy

Points: FS209.226

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.8 2.2.3 Policy

Points: FS209.227

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.11 2.5.2 Objectives

Points: FS209.228

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Support in part - could include wider community to clarify the statement that it is protecting all of the Taupo community.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.12 2.5.3 Policy

Points: FS209.229

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as - we require a greater degree of clarification the practical meaning of te oranga o te taiao, te oranga o nga taonga tuku iho, te oranga o te tangata in Council's definitions

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.33 2.5.3 Policy

Points: FS209.230

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes - The wording proposed does not align with the NPS-REG that states that REG has benefit for social, and economic wellbeing pf people and communities.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #9 Lucy Edwards (C/- Tonkin & Taylor Ltd , Wellington, New Zealand, 6140)

Original Point: #9.6 Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: FS209.231

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this position

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #11 Douglas Colin Wallace (208 Tukairangi Road, RD 5, Taupo, New Zealand, 3385)

Original Point: #11.3 4b.4.12 Maximum Artificial Light Level

Points: FS209.232

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.5 Objective 3b.2.1 Enable Primary Production

Points: FS209.233

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this positionandnbsp;

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.8 Objective 3b.2.5 Avoidance of reverse sensitivity

Points: FS209.234

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this position as there are other established and lawful activities that have a functional and operational need to be in the rural environment.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.11 Policy 3b.2.13 Avoiding reverse sensitivity

Points: FS209.235

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this position as there are other established and lawful activities that have a functional and operational need to be in the rural environment, and which may not require set backs from primary production.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.3 Plan Change 38 - Strategic Directions

Points: FS209.236

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy in part supports this position as renewable electricity generation is not a rural industry. However, renewable electricity has a functional and operational need to be in the rural environment.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.4 Plan Change 38 - Strategic Directions

Points: FS209.237

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy in part supports this position as renewable electricity generation has a need for ancillary earthworks. However, renewable electricity has a functional and operational need to be in the rural environment.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.10

Points: FS209.238

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this position as the Taupo DC should give effect to all existing NPS documents

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #78 Dominic Adams (, New Zealand)

Original Point: #78.3 Amendments to the Definitions of the Taupō District Plan Section 10 **Points:** FS209.239

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #78 Dominic Adams (, New Zealand)

Original Point: #78.5 Objective 3b.2.5 Avoidance of reverse sensitivity

Points: FS209.240

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.12 3b.2 Objectives and Policies - General Rural Environment

Points: FS209.241

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.13 3b.2 Objectives and Policies - General Rural Environment

Points: FS209.242

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission and its intent to seek clarity of policy direction.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #101 Jane Penton (27 Te Hātepe Avenue, Taupo, New Zealand, 3330)

Original Point: #101.7 4b Rural Environment

Points: FS209.243

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission, as provision needs to be made for infrastructure and activities that have a functional requirement to be located in these areas.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #101 Jane Penton (27 Te Hātepe Avenue, Taupo, New Zealand, 3330)

Original Point: #101.8 4b Rural Environment

Points: FS209.244

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission, as provision needs to be made for infrastructure and activities that have a functional requirement to be located in these areas.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #106 Tim Lester (127 Alexandra Street, Hamilton Central, Hamilton, New Zealand, 3204)

Original Point: #106.15 Objective 3b.2.4 Other activities

Points: FS209.245

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #106 Tim Lester (127 Alexandra Street, Hamilton Central, Hamilton, New Zealand, 3204)
Original Point: #106.17 Policy 3b.2.13 Avoiding reverse sensitivity **Points: FS209.246**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #106 Tim Lester (127 Alexandra Street, Hamilton Central, Hamilton, New Zealand, 3204)
Original Point: #106.18 Objective 3b.3.2 Avoid reverse sensitivity **Points: FS209.247**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)
Original Point: #110.1 Plan Change 38 - Strategic Directions **Points: FS209.248**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)
Original Point: #110.2 Plan Change 38 - Strategic Directions **Points: FS209.249**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.13 3b Rural Environment Chapter

Points: FS209.250

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission, the Council should be providing for all NPS documents and implementing all existing National Planning Standards.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.14 3b.1 Introduction

Points: FS209.251

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #112 Annabelle Lee (Unknown, New Zealand, Unknown)

Original Point: #112.9 4b.2.9 Maximum Noise - Limits

Points: FS209.252

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Original Submitter: #114 Alana Delich (72 Hinemoa Avenue, Taupo, New Zealand, 3330)

Original Point: #114.13 4b Rural Environment

Points: FS209.253

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission, as provision needs to be made for infrasture and activities that have a functional requirement to be located in these areas.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

All

Attached Documents

File
Manawa Energy Taupo DC Further Submissions 38 and 42 April 2023



Further Submissions Taupō District Council District Plan Changes 38 & 42

Submission to the Taupō District Council

April 2023

**FURTHER SUBMISSIONS THAT ARE IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSIONS ON THE OTAGO REGIONAL POLICY STATEMENT – FRESHWATER INSTRUMENT
UNDER CLAUSE 8 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991**


1. **Name of submitter:** Manawa Energy Limited (Manawa Energy)
2. This is a Further Submission on the **Taupō District Council District Plan Changes 38 & 42**
3. **Manawa Energy could not** gain an advantage in trade competition through this submission.
4. Further submission from Manawa Energy is as follows and contains:
 - the particular parts of the original submission (as derived from the summary of submissions) that Manawa has submitted on;
 - reasons for the submission; and
 - the decision sought.
5. **Aa a generator and supplier of electricity, Manawa Energy** has an interest in the proposal that is greater than the interest in the general public.
6. **Manawa Energy does wish** to be heard in support of this submission.
7. If others make a similar submission, **Manawa Energy will** consider presenting a joint case with them at a hearing.
8. Submitter Details:

Address for service: Manawa Energy Limited
Private Bag 12055
TAURANGA 3143
Attention: James Ryan

Phone: 027 234 0396

Email: james.ryan@manawaenergy.co.nz

Signature:



For, and on behalf of, Manawa Energy Limited

Dated: 04 April 2023

Manawa Energy's Further Submissions

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Plan Change 38 – Strategic Directions				
NZ Pork Industry Board – Hannah Ritchie				
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS22.17	Amend Objective 2.2.2(1) to an objective that corresponds to the function, powers and duties of the territorial authority.	Proposed Objective 2.2.2(1) appears to extend the matters TDC would consider to include water quality from a discharge perspective which creates confusion between the function, powers and duties of the territorial authority from the regional council.	Support	Manawa Energy supports this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Strategic Directions > 2.2.3 Policy - OS22.18	Explain in the strategic direction what benefits the district plan seeks to achieve for water quality within the function, powers and duties of the territorial authority.	In the absence of being able to review a comprehensive planning response (rather than sectional plan changes) the policy cannot be understood.	Support	Manawa Energy supports this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Strategic Directions > 2.2.3 Policy - OS22.19	Amend Policy 2.2.3(5) to a policy that corresponds to the function, powers and duties of the territorial authority.	NZ Pork does not support duplication of land use and discharge management requirements between regional and district plans to manage freshwater quality.	Support	Manawa Energy supports this submission.
Chapter 2 Strategic Directions - OS22.23	Create a new strategic direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the	Create a new strategic direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the district. The	Oppose in part	Manawa in part opposes this submission as renewable electricity generation has a functional and operational need to be in the rural

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>district.</p> <p><u>Social and Economic Wellbeing Taupo's rural environment contributes positively to the districts economic and social wellbeing. Productive capacity Rural land remains available for primary production activities and productive capacity is protected. Reverse Sensitivity Reverse sensitivity effects are managed so as not to constraint primary production activities Rural lifestyle Opportunities for rural lifestyle subdivision and development are only provided in parts of the rural environment where they do not conflict with enabling primary production and protecting the productive potential of land.</u></p>	<p>rural environment is the largest by area within the district. Not acknowledging or defining the key issues for the zone within the strategic objectives downplays the importance of the rural environments to the district.</p>		<p>environment and therefore cannot be excluded.</p>
Horticulture NZ – Sarah Cameron				
<p>Strategic Directions - OS26.59</p>	<p>Add to chapter 38: <u>SD – RE-01 Primary production activities are recognised and provided for to enable them to operate efficiently and effectively to ensure the contribution for the economic and social wellbeing of the district and not be</u></p>	<p>Add new strategic direction for rural environment.</p>	<p>Oppose in part</p>	<p>Manawa in part opposes this submission as renewable electricity generation has a functional and operational need to be in the rural environment and therefore cannot be excluded.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>compromised by inappropriate subdivision, use and development</u> <u>SD – RE – 02</u> <u>Protection of highly productive land from inappropriate development to ensure its production potential for generations to come.</u></p>			
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS26.60	Delete 2.2 strategic direction freshwater quality / te mana o te wai.	Council has no jurisdiction over the matters raised in 2.2.	Support	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Waikato Regional Council – Joao Paulo				
2.5 Strategic Direction 5 Significant and Local Infrastructure - OS29.10	Amend wording by changing the percentage from 20% to 27% and providing wording that recognises the local and national importance of Taupo's electricity-producing capability.	The District Plan should explicitly recognise the importance of the district's electricity-generating capacity to the local and national economy.	Support	Manawa Energy supports this submission.
Tuakairangi Trust – Chris Marshall				
2.4 Strategic Direction 4 Climate Change -	Submitter suggests a toll is imposed on private vehicle use and	Submitter questions how higher emissions from increased vehicle	Oppose	Manawa Energy opposes this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
OS46.6	this used to subsidise public transport.	movement will result in positive climate outcomes.		
2.4.3 Policy - OS46.8	Submitter suggests that only development of land that would result in positive climate change outcomes would be land use change to forestry or retirement and revegetation of some kind.	Submitter states any subdivision/development that does not offset emissions by tree planting or buying carbon credits will not result in positive climate change outcomes.	Oppose	Manawa Energy opposes this submission.
2.4.3 Policy - OS46.9	Avoid subdivision and development in natural ephemeral waterways, wetlands or LIAs.	Subdivision and land use development that encroaches on natural ephemeral waterways, wetlands or LIAs that are prone to erosion will not be resilient to climate change.	Oppose	Manawa Energy opposes this submission.
Pukawa D2 Trust – Joan Forret				
Strategic Directions - OS58.1	The following chapter provides an outline of the key strategic and significant resource management matters for the Taupo district. This chapter includes objectives and policies to guide decision making at a strategic level. <u>The order of the Strategic Directions reflects the status and importance of each Direction and its objectives and policies.</u>	Clear understanding of the legal status of the directions is required to assist planners when making assessments against the district plan. To assist with the importance and status of each direction, a hierarchy should be established.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>The strategic objectives set the direction for the District Plan and help to implement the Council's community outcomes for <u>resource management practices</u>. They are indicative of the matters which are important to the Taupo District community and Council and reflect the intended outcomes to be achieved through the implementation of the District Plan.</p> <p>... requirement to consider District Plan policy. <u>The strategic directions must be considered in all resource consent applications and plan changes.</u> ...</p>			
2.1 Strategic Direction 1 Tangata Whenua - OS58.6	<p>Recognise that <u>iwi management plans are higher order statutory documents</u> in decision making, and the importance of iwi environmental management plans in providing important guidance and direction on the sustainable use and development of the environment and natural resources.</p>	<p>Amend to make it clear that the iwi management plan takes precedence over the district plan. "Higher order statutory documents" is the terminology used in the section 32 report.</p>	Oppose	<p>Manawa Energy opposes this submission. Iwi settlement acts do not provide for a higher order status and iwi documents are only provided for in District planning.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.6 Strategic Direction 6 Natural Environment Values - OS58.9	The protection of the natural values of areas of significant indigenous vegetation and significant habitats of indigenous fauna from the adverse effects of inappropriate development, including through offsetting to result in a net environmental gain.	Offsetting is a recognised tool.	Oppose	Manawa Energy opposes this submission requiring offsetting to be a net gain.
2.6 Strategic Direction 6 Natural Environment Values - OS58.14	Protect the natural values of areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will have more than minor adverse effects on the ecological values that cannot be offset. and processes important to those areas.	Restrictions have been placed by Council over Maori land tenure, which resulted in present vegetation growing over land that was always used as gardens. Offsetting should be available as a tool to achieve a net environmental gain.	Oppose	Manawa Energy opposes this submission, renewable electricity generation has a functional and operational need to be in areas on SNA as that is the location of the energy resource.
2.6 Strategic Direction 6 Natural Environment Values - OS58.16	5. Encourage the protection, enhancement and restoration of natural and landscape value areas, including by Supporting opportunities for tangata whenua to exercise their customary responsibilities as mana whenua and kaitiaki in restoring, protecting and enhancing these areas.	Support in part - Policy 2.6.3.5. Allow tangata whenua to decide what is best for their land.	Oppose	Manawa Energy opposes this submission, renewable electricity generation has a functional and operational need to be in areas on SNA if that is the location of the energy resource.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Ngati Tahu-Ngati Whaoa Runanga Trust – Michelle Phillips				
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS66.2	Recognise the National Policy Statement for Freshwater Management (NPS-FM) which contains the principles of Te Mana o te Wai.	Submitter seeks amendment to provide context for the relevance and importance of Te Mana o te Wai.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Mercury – Hayley Stronge				
2.1.3 Policy - OS68.1	Retain policies 2.1.3(1) to 2.1.3(9) other than Policy 2.1.3(6) which should be deleted. Amend policies as shown below: 2.1.3 Policies 1. Recognise and provide for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, wahi tapu (sacred sites), and other taonga (treasures). ... 6. Enable development of Maori Land within the provisions of the plan for the purposes of fulfilling the economic and social aspirations of those owners. ...	Mercury supports all policies in 2.1.3 and Policy 2.1.3(2) in particular. This objective is consistent with the Matters of National Importance of the RMA and is appropriate in the context of supporting joint venture partnerships for several renewable electricity generation sites in the Taupo District. Mercury is of the view that policy 2.1.3(6) should be deleted as it duplicates Policy 2.1.3(2).	Support	Manawa Energy supports this submission.
2.2.2 Objective – OS68.2	Retain 2.2.2 Objective in same or similar form	This objective is consistent with the sustainable management purpose of	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		the RMA and is appropriate in the context of the issues facing Taupo District.		
2.3.2 Objectives - OS68.3	<p>Amend Objective 2.3.2(3) and add new Objective 2.3.2(8) as below:</p> <p>3. Subdivision, use and development of land <u>in appropriate locations</u> which will have demonstrable social and cultural benefits to the District's community will be supported.</p> <p><u>8. The East Taupo Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including renewable electricity generation activities.</u></p>	An important aspect of the urban form of Taupo is the East Taupo Arterial being an 'urban fence' separating urban activities to the west (particularly residential activities) from industrial and rural activities to the east including renewable electricity generation activities. It is important to reinforce this as an enduring objective in the District Plan.	Support	Manawa Energy supports this submission.
2.3.3 Policy - OS68.4	<p>Amend Policy 2.3.3(10) to read as follows:</p> <p>10. Manage subdivision use and development of land to ensure that it will not:</p> <p>a. ...</p> <p>b. unduly conflict with existing activities on adjoining properties <u>and the surrounding areas, ...</u></p>	Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. Reverse sensitivity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	d. give rise to reverse sensitivity effects from existing uses			
2.4 Strategic Direction 4 Climate Change - OS68.5	<p>Amend the introductory part of section 2.4 (STRATEGIC DIRECTION 4 CLIMATE CHANGE) as follows: Climate change has been identified as an issue which is important <u>globally and</u> within the Taupo District. ... It is important that the District and its communities are able to adapt to the effects of climate change to be resilient and safe....</p> <p>1. Effects on climate change – which refers to activities that may lead to an increase in greenhouse gasses and those which may result in a reduction of greenhouse gasses from discharged to the atmosphere or help to facilitate efforts towards decarbonisation, <u>including the electrification of home heating, transport and industry.</u></p> <p>2.</p> <p>...Supporting positive climate change outcomes and ensuring that the effects of climate change are recognised and provided for will assist in planning for a district which <u>helps avoid</u>, does not</p>	<p>Mercury strongly supports section 2.4 (climate change) and requests only minor amendments. Taupo District provides up to 20% of New Zealand's electricity supply, with more than 20 renewable electricity power stations mostly located in the Rural Environment. It is therefore one of the most significant land uses in the Taupo District.</p> <p>The importance of renewable electricity generation needs to be recognised and provided for in the Taupo District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupo District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	contribute to, and is resilient to, climate change...			
2.4.2 Objective - OS68.6	Retain objectives, 2.4.2(1), 2.4.2(2) and 2.4.2(3). In addition, add new objective 2.4.2(4) that reads: <u>4. An increase in the amount of electricity generated from renewable sources within the Taupo District to assist with the decarbonisation of the economy.</u>	Objectives 2.4.2(1), 2.4.2(2) and 2.4.2(3) are important for addressing the issues facing Taupo District, Aotearoa New Zealand and the world. In addition, a new objective needs to clearly articulate the necessity of increased renewable electricity generation to assist with the decarbonisation of the economy. This decarbonisation is essential for the country to achieve its international GHG reduction targets that it has committed to achieve.	Support	Manawa Energy supports this submission.
2.4.3 Policy - OS68.7	Retain policies 2.4.3(1). Delete policy 2.4.3(3) and policy 2.4.3(4). In addition, add new policies 2.4.3(2) and 2.4.3(3) as below and renumber proposed policy 2.4.3.(2) to policy 2.4.3.(4) with a minor amendment as below. 1.... 2. Land use activities which will unduly accelerate the effects of climate change will be discouraged. 3. Urban and built development must be designed in a manner which considers the need to reduce	Policies need to be included which specifically provide for and enable activities that will help address climate change.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>greenhouse gas emissions associated with that development and resulting land use.</p> <p><u>2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity, improved security of supply and transmission.</u></p> <p><u>3. Enable the upgrading and maintenance of existing and new renewable electricity generation activities and transmission, including where contributing to one of the following;</u></p> <ul style="list-style-type: none"> · <u>adaptation required to mitigate risks from climate change</u> <u>or</u> · <u>provides for increased electricity output, or greater efficiency</u> · <u>continued safe, efficient and secure operation.</u> <p><u>24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.</u></p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.5 Strategic Direction 5 Significant and Local Infrastructure - OS68.8	<p>Amend the introductory part of section 2.5 as follows:</p> <p>Infrastructure, ..., such as the three waters network, transport, communications, energy <u>electricity</u> generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators.</p> <p>....However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure <u>and the natural resources on which they rely on to operate.</u></p> <p>The Taupo District plays an important role in the location and provision of nationally 'significant infrastructure'. Its central location and natural resources means that Taupo is home to:</p> <ul style="list-style-type: none"> · ... · renewable electricity generation facilities that connect with the national grid, <u>that provide</u> electricity to meet up to 20% of New Zealand's total electricity demand... <p>In addition to nationally and regionally significant infrastructure, local roads and other infrastructure ... is vital for the ongoing</p>	<p>The introduction should more accurately refer to "electricity generation", not "energy generation". Renewable electricity generation activities is regionally significant whether or not it is connected to the national grid.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	functioning of the District District's urban and rural communities.			
2.5.2 Objectives - OS68.9	<p>Retain the following Objectives, subject to minor amendments to Objective 2.5.2(1) and 2.5.2(2) as follows:</p> <p>1. The wider benefits and strategic importance of nationally and regionally significant infrastructure to the District and wider, including the economic, cultural and social wellbeing of people and communities and for their health and safety, are recognised <u>and protected</u> in decision making and land use planning.</p> <p>2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and <u>encouraged achieved</u>.</p> <p>...</p>	Mercury supports all the objectives in 2.5.2 as infrastructure at all levels (locally, regionally and nationally significant infrastructure) is critical for the effective functioning and social and economic wellbeing of our communities. Minor additions are suggested to strengthen the objectives.	Support	Manawa Energy supports this submission.
2.5.3 Policy - OS68.10	Retain the following policies, subject to minor amendments to Policy 2.5.3(1) and 2.5.3(2) as follows:	Mercury supports all the policies in 2.5.3 as infrastructure at all levels (locally, regionally and nationally significant infrastructure) is critical for	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>2.5.3 Policies</p> <p>1. Recognise and provide for the national, regional and local benefits of renewable energy <u>electricity</u> generation activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.</p> <p>2. Recognise <u>and provide for</u> the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.</p> <p>...</p>	<p>the effective functioning and social and economic wellbeing of our communities. The policies are appropriate ways of achieving the objectives in 2.5.2. The submitter seeks minor amendments to strengthen/clarify the policies.</p>		
2.6.3 Policy - OS68.11	<p>Add the following new policy 2.6.3(7) as follows:</p> <p><u>7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure.</u></p>	<p>Mercury supports the addition of one additional policy which covers an increasingly important aspect of consenting renewable electricity generation activities.</p>	Support	<p>Manawa Energy supports this submission.</p>
Genesis Energy – Alice Lin				

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.3.2 Objectives - OS84.1	Retain with amendment as shown below. 3. Subdivision, use and development of land <u>in appropriate locations</u> which will have demonstrable social and cultural benefits to the District's community will be supported.	Genesis generally supports the proposed objectives. A minor edit is suggested to provide clarity.	Support	Manawa Energy supports this submission.
2.3.3 Policy - OS84.2	Retain provisions subject to amendments below 5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and of additional infrastructure),... 10. Manage subdivision use and development of land to ensure that it will not: a.... b. unduly conflict with existing activities on adjoining properties <u>and the surrounding areas</u> . c.... d. give rise to reverse sensitivity effects from existing uses	Genesis generally supports the proposed policies. However, in respect of Policy 10, Genesis considers conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. In addition, reverse sensitivity effects do not arise from "existing uses" – they arise from new or expanded sensitive activities locating in proximity to existing uses. Suggested changes are therefore made to accurately reflect the intent of Policy 10.	Support	Manawa Energy supports this submission.
2.4 Strategic Direction 4 Climate Change -	Climate change is one the most significant issues facing the entire planet. As noted in section 2.5 Strategic Direction 5 Significant and	Genesis consider the importance of renewable electricity generation needs to be appropriately recognised and provided for in the Taupo District	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
OS84.3	<p>Local Infrastructure, the Taupo District provides up to 20% of New Zealand's electricity supply. There are more than 20 renewable electricity power stations in the Taupo District, mostly located in the Rural Environment. It is therefore one of the most significant land uses in the Taupo District.</p> <p>Genesis consider the importance of renewable electricity generation needs to be appropriately recognised and provided for in the Taupo District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupo District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.</p> <p>The minor changes are therefore suggested to strengthen the overview statement leading to the objectives and policies in this section.</p>	<p>Plan, particularly within this section that sets out how climate change is to be addressed within the Taupo District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation. The minor changes are therefore suggested to strengthen the overview statement leading to the objectives and policies in this section.</p>		

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.4.2 Objective - OS84.4	Genesis supports the proposed directions for community resilience and adaptation to the effects of climate change. However, with the serious implications of climate change being increasingly experienced across New Zealand, Genesis considers explicit references for direct actions are required in conjunction with objectives that build resilience and adaptation. Genesis considers a new objective should be included that explicitly recognises the increasing contribution renewable electricity generation in the District has on reducing greenhouse gas emissions and mitigating the potential effects of climate change.	Genesis supports the proposed directions for community resilience and adaptation to the effects of climate change. However, with the serious implications of climate change being increasingly experienced across New Zealand, Genesis considers explicit references for direct actions are required in conjunction with objectives that build resilience and adaptation. Genesis considers a new objective should be included that explicitly recognises the increasing contribution renewable electricity generation in the District has on reducing greenhouse gas emissions and mitigating the potential effects of climate change.	Support	Manawa Energy supports this submission.
2.4.3 Policy - OS84.5	Retain 2.4.3 Policy subject to amendments below. 2.4.3 Policies 1.... 2. <u>Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonisation of the economy, including a reduction in greenhouse gas emissions, increased electricity generation</u>	As outlined in 2.4.2 Objective above, Genesis considers two new policies need to be included which specifically provide for and enable activities that will help address climate change.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>capacity and improved security of supply including transmission.</u></p> <p><u>3. Enable the upgrading and maintenance of existing and the development of new renewable electricity generation activities, including where contributing to one of the following:</u></p> <ul style="list-style-type: none"> · <u>adaptation required to mitigate risks from climate change</u> · <u>provides for more electricity output, or greater efficiency</u> · <u>continued safe, efficient and secure operation.</u> <p><u>24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.</u></p> <p><u>35....</u></p> <p><u>46. Subdivision, use and development of land...</u></p>			
2.5 Strategic Direction 5 Significant and Local Infrastructure - OS84.6	<p>Retain 2.5 overview statement subject to amendments below.</p> <p>2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE</p> <p>Infrastructure, ..., transport, communications, energy <u>electricity</u> generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators.</p>	<p>Genesis generally supports the proposed overview statement which identifies the range of infrastructure important within the District. Minor changes are however suggested to provide clarity and accuracy. In particular, Genesis considers "energy generation" should be more accurately referenced as "electricity generation". In addition, as "significant infrastructure" is not (and</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>...However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure <u>and the natural resources on which they rely on to operate.</u></p> <p>...Taupo is home to:</p> <ul style="list-style-type: none"> · ... · renewable electricity generation facilities that connect with the national grid, accounting for up to 20% of New Zealand's total electricity demand · ... <p>In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the Districts District's urban and rural communities.</p>	<p>should not be) a defined term, Genesis considers the quotation marks should be removed to avoid confusion.</p>		
2.5.2 Objectives - OS84.7	<p>Retain 2.5.2 Objectives subject to amendments below.</p> <p>2.5.2 Objectives</p> <p>1. The wider benefits and strategic importance of nationally and regionally significant infrastructure to the District and wider, including the economic, cultural and social</p>	<p>Genesis supports 2.5.2 Objectives which appropriately recognises the strategic importance and benefits of infrastructure, including electricity infrastructure. Minor changes are suggested to strengthen the objectives.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>wellbeing of people and communities and for their health and safety, are recognised <u>and protected</u> in decision making and land use planning.</p> <p>2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and <u>encouraged achieved</u>.</p> <p>3....</p>			
2.5.3 Policy - OS84.8	<p>Retain 2.5.3 Policy subject to amendments below.</p> <p>Amend to read as follows:</p> <p>2.5.3 Policiesy</p> <p>1. Recognise and provide for the national, regional and local benefits of renewable energy<u>electricity</u> generation activities...</p> <p>2. Recognise <u>and provide for</u> the functional and operational needs....</p>	<p>Genesis generally supports the proposed policies; however, minor changes are suggested to strengthen the provisions and to provide clarity and accuracy as outlined elsewhere in Genesis' submission.</p>	Support	<p>Manawa Energy supports this submission.</p>
2.6.2 Objectives - OS84.9	<p>Retain 2.6.2 Objectives with amendments below.</p> <p>2.6.2 Objectives</p> <p>1. Recognise the importance of the districts <u>District's</u> natural values and</p>	<p>Genesis generally supports the proposed objectives. Minor changes are suggested for accuracy.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>landscapes and their significance to the Taupo Districts District's communities and identity.</p> <p>2....</p> <p>4. Recognition of the extent of indigenous vegetation and habitat under on Maori land tenure, and the need to provide for the important relationship of Maori and their culture and traditions with their ancestral lands and waaahi tapu....</p>			
2.6.3 Policy - OS84.10	<p>Retain 2.6.3 Policy subject to new clause 7 shown below:</p> <p><u>7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and Regionally Significant Infrastructure.</u></p>	<p>Genesis generally supports the proposed policies. However, in addition to minor changes suggested for accuracy, Genesis considers the potential benefits provided by offset measures and compensation should be explicitly provided for, particularly when considered against development and activities that have a wider benefit (e.g. regional, national and global) such as renewable electricity generation activities and Regionally Significant Infrastructure.</p>	Support	Manawa Energy supports this submission.
Strategic Directions - OS84.47	<p>Include an Energy Chapter in the Taupo District Plan in accordance with the National Planning Standards, either as a result of Plan</p>	<p>Genesis seeks the inclusion of an Energy Chapter in the Taupo District Plan in accordance with the National Planning Standards, either as a result</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	Change 38 or by way of a subsequent Proposed Plan Change in the near future.	of Plan Change 38 or by way of a subsequent Proposed Plan Change in the near future. There are more than 20 power stations in the Taupo District making renewable electricity generation one of the most significant activities in the Taupo District.		
DOC – Ashiley Sycamore				
Strategic Directions - OS89.1	<p>The Council should undertake a review of the NPS-IB exposure draft (or the soon to be gazetted NPS-IB document) to confirm Proposed Plan Change 38 is giving effect to this national direction. The Strategic Directions chapter should be updated to give effect to the NPS-IB where required.</p> <p>Any other amendments that may be necessary or appropriate to address my concerns.</p>	<p>The NPS-IB currently has no legal effect; however, it is expected to come into effect in December 2022 prior to the further submission and hearing process of Plan Change 38. The Director-General considers it would be effective and efficient to align the review of the Plan Change 38 provisions with the policy direction and requirements anticipated under the NPS-IB, to avoid an additional plan change.</p>	Oppose	<p>Manawa Energy opposes this submission as there will be a separate process and timeframes for the District Council to implement this NPS-IB if and when it comes into effect.</p>
2.1 Strategic Direction 1 Tangata Whenua - OS89.3	<p>Retain as notified, unless iwi/hapu/whanau request specific changes.</p> <p>Note: There are spelling errors in this section that should be</p>	<p>The Director-General generally supports the tangata whenua section, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	corrected prior to Plan Change 38 becoming operative e.g. "the Te Tirirti o Waitangi" should be corrected to "Te Tiriti o Waitangi"; "mautaranga" should be corrected to "matauranga".	wording of the chapter. The provisions are consistent with Part 2 of the RMA and wider planning documents.		
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS89.4	Retain as notified, unless iwi/hapu/whanau request specific changes.	The Director-General generally supports the freshwater quality/Te Mana o te Wai section, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the cultural objectives and policies within this section. The provisions give effect to the NPS-FM and wider planning documents.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Federated Farmers – Colin Guyton				
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS91.3	(a) the amendment of strategic direction 2 Freshwater Quality / Te Mana o te Wai to achieve consistency with the requirement of the National Objectives Framework; and (b) any consequential amendments required as a result of the relief sought.	The proposed strategic direction for freshwater needs to be rewritten to ensure that it achieves consistency with the National Objectives Framework and clearly sets out the defined process that the framework has defined. It is essential that the strategic direction supports the national direction that has been set by central government.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.4 Strategic Direction 4 Climate Change - OS91.5	<p>(a) the amendment of Policy 2.4.3 as currently written to read as below or with wording to similar effect;</p> <p>2. Land use activities which will <u>unduly overly</u> accelerate the effects of climate change will be discouraged <u>recognising that some land use activities will be able to continue with no significant changes to their emissions output.</u></p> <p>(b) and any consequential amendments required as a result of the relief sought.</p>	<p>Federated Farmers supports the inclusion of a strategic direction that deals with climate change and how important it is to ensure that communities need to become climate change resilience.</p> <p>Policy 2.4.3(2) is not supported as it is currently written. There should be an acknowledgement that some land use activities have a functional need for occurring and that some may not be able to achieve a positive climate change outcome but are also not increasing their emissions into the environment.</p>	Support	Manawa Energy supports this submission.
2.5 Strategic Direction 5 Significant and Local Infrastructure - OS91.6	<p>(a) the addition to Policy 2.5.3 of a new clause to read as below or with wording to similar effect;</p> <p><u>6. To recognise the reverse sensitivity effects infrastructure may have on existing land use activities and to avoid, remedy or mitigate these effects where possible.</u></p> <p>(b) and any consequential amendments required as a result of the relief sought.</p>	<p>Federated Farmers supports strategic direction 5 as it is currently drafted including the objectives and policies. However, we seek an amendment to the policies so that it is acknowledged that infrastructure can (and does) have reverse sensitivity effects on existing land use activities such as farming and primary production.</p>	Oppose	Manawa Energy opposes this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.6 Strategic Direction 6 Natural Environment Values - OS91.7	(a) the amendment of strategic direction 6 Natural Environment Values to recognise and provide for non-regulatory methods as well as the role that private landowners play in the preservation of natural environment values; and (b) any consequential amendments required as a result of the relief sought.	There are concerns that the proposed objectives and policies do not provide for existing activities to continue. There needs to be an additional objective and policy that recognises and provides for existing activities such as grazing and other farming activities to continue if the scale and intensity of effects do not / have not increased following the commencement date of the plan. Federated Farmers supports the use of non-regulatory measures to assist landowners to continue this journey. The Council needs to be prepared to function as an intermediary so that effective partnerships can be established between all the parties involved with the protection of indigenous vegetation and fauna and natural values and landscapes to ensure the best possible outcomes.	Support	Manawa Energy supports this submission.
Contact Energy – Mark Chrisp				
Strategic Directions - OS93.2	Amend the introduction to Chapter 2 Strategic Directions to read as follows: Chapter 2 Strategic Directions The following chapter provides an outline of the key strategic and	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>significant resource management matters for the Taupo dDistrict. This chapter includes objectives and policies to guide decision making at a strategic level...</p> <p>The key strategic or significant resource management matters for the district for the Taupo District are:</p> <p>1. Tangata Whenua...</p>			
2.1 Strategic Direction 1 Tangata Whenua - OS93.3	<p>Amend to read as follows: 2.1 STRATEGIC DIRECTION 1 TANGATA WHENUA</p> <p>The Council, through the District Plan, is required to take into account the Pprinciples of the te Tirirti o Waitangi. This is to be done at all levels of planning and decision making under the Plan....</p> <p>The dDistrict pPlan has an important role to play in supporting mana whenua in achieving these aspirations.</p> <p>The Council is also required to, in partnership with mana whenua, recognise and provide for the mMaori values in resource management and decision making. These include the important relationship of mMaori and their culture and traditions with their</p>	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	ancestral lands, water, sites, waahi tapu and other taonga and to have particular regard to kaitiakitanga. This is to happen not just through recognition and incorporation of these matters into the p Plan but also the wider decision making and plan implementation process...			
2.1.2 Objective - OS93.4	Amend to read as follows: 2.1.2 Objectives 1. ... 3. Resource management planning and decision making reflects tikanga, mana whakahaere, kaitiakitanga, manaakitanga, whakapapa, mautaranga M Maori and te whanake....	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.
2.1.3 Policy - OS93.5	Amend to read as follows: 2.1.3 Policies 1.... 5. Recognise the wider constraints on the utilisation and development of M Maori land as different from land in freehold title....	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.
2.2 Strategic Direction 2 Freshwater Quality /	Amend to read as follows: 2.2 STRATEGIC DIRECTION 2 FRESHWATER QUALITY / TE MANA	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Te Mana O Te Wai - OS93.6	<p>O TE WAI</p> <p>... The Taupo District Plan has a responsibility role to assist with to <u>responsibility role to assist with</u> the management of the adverse effects on the environment that may arise from subdivision and land use in the District. Managing the adverse effects on waterways resulting from subdivision and land use forms part of that responsibility and there are clear benefits from doing this. The state of the Districts freshwater resources is of significant interest to the Taupo District community, and it is important that positive freshwater outcomes are achieved through the application <u>implementation</u> of the Plan.</p>			
2.3 Strategic Direction 3 Urban Form and Development - OS93.7	<p>2.3 STRATEGIC DIRECTION 3 URBAN FORM AND DEVELOPMENT</p> <p>The Taupo District <u>District's</u> diverse and growing population has led to increased demand for housing and demand for new commercial and industrial areas...The District Plan provides a framework for ensuring that urban development, subdivision and changes in land use occurs in a planned and efficient manner and is adequately</p>	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>serviced by infrastructure (including development and of additional infrastructure).</p> <p>...This approach reflects the an efficient and effective urban form which will develop in a manner that is appropriately serviced by infrastructure reflects the important values and communities within the District...</p>			
2.3.2 Objectives - OS93.8	<p>2.3.2 Objectives</p> <p>1...</p> <p>3. Subdivision, use and development of land <u>in appropriate locations</u> which will have demonstrable social and cultural benefits to the District's community will be supported.</p> <p>4....</p> <p>5. The Town Centre Environment is strengthened and reinforced as the primary commercial, retail, recreational, cultural and entertainment centres for Taupo District.</p> <p>6. ...</p> <p><u>8. The East Taupo Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including</u></p>	<p>An important aspect of the urban form of Taupo is the East Taupo Arterial being an 'urban fence' separating urban activities to the west (particularly residential activities) from industrial and rural activities to the east including renewable electricity generation activities. It is important to reinforce this as an enduring objective in the District Plan. The ability to utilise the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes, unfettered by the establishment of compatible urban activities, is recognised as a matter of both regional and national significance in the Waikato Regional Policy Statement (RPS) and the National Policy Statement for</p>		

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>renewable electricity generation activities.</u>	Renewable Electricity Generation (NPS-REG).		
2.3.3 Policy - OS93.9	<p>Amend to read as follows:</p> <p>2.3.3 Policiesy</p> <p>1...</p> <p>5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and of additional infrastructure), according to the capacity limitations of that infrastructure.</p> <p>6....</p> <p>7. Provide for the development of Papakainga on mMaori land to facilitate mMaori occupation on their ancestral lands.</p> <p>8....</p> <p>9. Restrict the location and development of retail and commercial activities within non-commercial areas of the district to ensure that the town centre continues to be the district district's pre-eminent retail, commercial and mixed-use centres.</p> <p>10. Manage subdivision use and development of land to ensure that it will not:</p> <p>a. have an adverse effect on the</p>	There are a number of typos that need to be corrected and other edits. Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. Reverse sensitivity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>functioning of the environment where it is located,</p> <p>b. unduly conflict with existing activities on adjoining properties <u>and the surrounding areas,</u></p> <p>... d. give rise to reverse sensitivity effects from existing uses</p> <p>≡</p>			
2.4 Strategic Direction 4 Climate Change- OS93.10	<p>2.4 STRATEGIC DIRECTION 4 CLIMATE CHANGE</p> <p>Climate change has been identified as an issue which is important <u>globally and</u> within the Taupo District. A warming environment, longer and drier droughts and increased intensity of storm events are anticipated. It is important that the District and its communities are able to adapt to the effects of climate change to be resilient and safe.</p> <p>For environmental management and planning purposes there are two separate, but important aspects of climate change:</p> <p>1. Effects on climate change – which refers to activities that may lead to an increase in greenhouse gasses and those which may result in a reduction of greenhouse gasses from discharged to the</p>	<p>The importance of renewable electricity generation needs to be recognised and provided for in the Taupo District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupo District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>atmosphere or help to facilitate efforts towards decarbonisation, <u>including the electrification of home heating, transport and industry.</u></p> <p>2....</p> <p>It is important to consider both of these aspects of climate change to effectively enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety. Supporting positive climate change outcomes and ensuring that the effects of climate change are recognised and provided for will assist in planning for a district which <u>helps avoid</u>, does not contribute to, and is resilient to, climate change....</p>			
2.4.2 Objective - OS93.11	<p>2.4.2 Objectives</p> <p>1. Subdivision, use and development of land in the Taupo District will result in positive climate change outcomes.</p> <p><u>2. An increase in the amount of electricity generated from renewable sources within the Taupo District to assist with the decarbonisation of the economy.</u></p> <p>2. Subdivision, use and</p>	<p>A new objective needs to clearly articulate the desirability of increased renewable electricity generation to assist with the decarbonisation of the economy (both within the Taupo District, regionally and nationally). There are a number of typos that need to be corrected.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>development of land in the Taupo District will be resilient to the current and future effects of climate change on the District's current and future communities, including any disproportionate effects on Maori Maori.</p> <p>3. The Taupoo District is well prepared to adapt to the risks and effects from climate change, such as natural hazards.</p>			
2.4.3 Policy - OS93.12	<p>2.4.3 Policiesy</p> <p>1. Land use activities which will result in positive climate change outcomes, including through reducing greenhouse gas emissions and decarbonisation, will be supported and encouraged.</p> <p><u>2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity and improved security of supply including transmission.</u></p> <p><u>3. Enable the upgrading and maintenance of existing and development of new renewable</u></p>	<p>Policies need to be included which specifically provide for and enable activities that will help address climate change. There are a number of typos that need to be corrected.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>electricity generation activities and transmission, including where contributing to one of the following:</u></p> <ul style="list-style-type: none"> · <u>adaptation required to mitigate risks from climate change</u> · <u>provides for increased electricity output, or greater efficiency</u> · <u>continued safe, efficient and secure operation.</u> <p>24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.</p> <p>35....</p>			
2.5 Strategic Direction 5 Significant and Local Infrastructure - OS93.13	<p>2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE</p> <p>Infrastructure, as defined in the Resource Management Act generally encompasses physical services and facilities which enable society to function, such as the three waters network, transport, communications, energy <u>electricity</u> generation...</p> <p>...However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure</p>	<p>The introduction should more accurately refer to "electricity generation" and not "energy generation". Renewable electricity generation activities is regionally significant whether or not it is connected to the national grid.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>and the natural resources on which they rely on to operate.</u> ...Its central location and natural resources means that Taupo is home to:</p> <ul style="list-style-type: none"> · ... · renewable electricity generation facilities that connect with the national grid, accounting for up to 20% of New Zealand's total electricity demand <p>... In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the District District's urban and rural communities.</p>			
2.5.2 Objectives - OS93.14	<p>Retain the following Objectives: 2.5.2 Objectives 1. The wider benefits and strategic importance of nationally and regionally significant infrastructure to the District and wider, including the economic, cultural and social wellbeing of people and communities and for their health and safety, are recognised <u>and protected</u> in decision making and land use planning.</p>	<p>Minor additions are sought to the policies.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and encouraged <u>achieved</u>.</p> <p>3....</p>			
2.5.3 Policy - OS93.15	<p>Amend to read as follows: 2.5.3 Policiesy</p> <p>1. Recognise and provide for the national, regional and local benefits of renewable energy <u>electricity</u> generation activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.</p> <p>2. Recognise <u>and provide for</u> the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.</p> <p>3....</p>	<p>The introduction should more accurately refer to "electricity generation" and not "energy generation".</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.6 Strategic Direction 6 Natural Environment Values - OS93.16	<p>Amend to read as follows:</p> <p>2.6 STRATEGIC DIRECTION 6 NATURAL ENVIRONMENT VALUES</p> <p>The Taupo eDistrict is characterised by important landscapes and natural areas. ... As well as being an important part of the District <u>District's</u> identity...</p> <p>The effects of human activities such as built development, vegetation clearance and land development etc. can significantly alter the character of the environment resulting in the loss of these areas and their values....</p> <p>These areas are on a range of public (reserve, forest and national parks) and private tenure land.</p> <p>There is also a high proportion of these areas on mMaori land throughout the District which can impact the ability of mMaori landowners in undertaking development on their ancestral lands.</p>	Submitter seeks minor edits.	Support	Manawa Energy supports this submission.
2.6.2 Objectives - OS93.17	<p>2.6.2 Objectives</p> <p>1. Recognise the importance of the District <u>District's</u> natural values and landscapes and their significance to the Taupo District <u>District's</u> communities and identity.</p>	Submitter seeks minor edits.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>2....</p> <p>4. Recognition of the extent of indigenous vegetation and habitat under <u>on</u> Maori land tenure, and the need to provide for the important relationship of Maori and their culture and traditions with their ancestral lands and waahi tapu....</p>			
2.6.3 Policy - OS93.18	<p>Amend to read as follows:</p> <p>2.6.3 Policiesy</p> <p>... <u>7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure.</u></p>	<p>Minor edits are proposed and the addition of one additional policy which covers an increasingly important aspect of consenting renewable electricity generation activities.</p>	Support	<p>Manawa Energy supports this submission.</p>
2.2.2 Objective - OS93.19	<p>Retain the objective.</p>	<p>Submitter supports the Objective.</p>	Support	<p>Manawa Energy supports this submission.</p>
2.2.3 Policy - OS93.20	<p>Retain the objective.</p>	<p>Submitter supports the Objective.</p>	Support	<p>Manawa Energy supports this submission.</p>
2.2.3 Policy - OS93.21	<p>Retain the objective.</p>	<p>Submitter supports the Objective.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
LWAG – Jane Penton				
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS101.1	LWAG support '2.2 STRATEGIC DIRECTION 2 FRESHWATER QUALITY / TEMANA O TE WAI	As with past submissions on water quality and quantity LWAG have sought that LID principles be incorporated into subdivision and land use change. We have seen considerable advances in their inclusion in local greenfield developments.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS102	LWAG ask that Strategic Directions include provision for all new builds to incorporate rainwater harvesting systems designs to use water for on-site irrigation and toilet facilities (as per above).	Potable water is an expensive resource for this community and our per capita water use remains high compared to other districts. While understanding government changes to water supply are pending, LWAG are concerned that TDC has not included specific planning provisions relating to rainwater collection - either retrofitting or for new builds.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Kainga Ora – Gurv Singh				
2.2.2 Objective - OS104.3	The submitter seeks to insert a new objective under Freshwater Quality /Te Mana o Te Wai, as follows: <u>2.2.2(2) The health and wellbeing of the Waikato River is restored and protected so that it may sustain</u>	The submitter considers that an objective should also be included under PC38 to further support the application of Te Ture Whaimana within the District Plan.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>abundant life and prosperous communities.</u>			
Transpower – Trudi Burney				
2.5.3 Policy - OS110.6	Retain this policy. Provide a definition for 'nationally significant infrastructure' and 'regionally significant infrastructure', and include the National Grid in both definitions.	'Nationally and regionally significant infrastructure' is not defined in the Plan. These terms need to be defined so that the application of the policy is clear.	Support	Manaw Energy supports this submission - clarification for these terms would be beneficial since there is a large amount of NSI and RSI in the region
2.5.3 Policy - OS110.7	Amend 2.5.3 Policy as follows: 3. Subdivision, land use and development will not adversely affect (including reverse sensitivity effects) <u>or compromise</u> the effective and safe functioning of infrastructure.	Transpower requests minor amendments to this policy to clarify that activities should not compromise the operation of infrastructure. Infrastructure may be compromised in other ways beyond just reverse sensitivity effects, and the policy should reflect this. It is noted Proposed Plan Change 42 contains no subdivision or earthworks rules specific to the National Grid.	Support	Manawa Energy supports this submission.
Te Kotahitanga o Ngati Tuwharetoa – George Asher				
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai -	That Objective 2.2.2 contain an explicit primary objective reference as provided below. <u>That freshwater and water bodies be managed in accordance with the</u>	TKNT note that the objectives contained in this section do not provide explicit recognition of Te	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
OS115.4	<p><u>hierarchy and principles of Te Mana o te Wai:</u></p> <ol style="list-style-type: none"> 1. <u>To protect its mauri and values so that the water is safe for use for traditional medicinal purposes, for drinking, for taking kai and for swimming.</u> 2. <u>To protect freshwater ecosystems, indigenous species, and trout fisheries.</u> 3. <u>To reflect the vision and objectives of nga hapu o Tuwharetoa as contained within Te Kaupapa Kaitiaki</u> 4. ... 	<p>Mana o te Wai nor do they reflect the contents of Te Kaupapa Kaitiaki.</p>		
2.2.3 Policy - OS115.5	<ol style="list-style-type: none"> 1. <u>Manage waterbodies in a manner that enhances the health and well-being</u> of tangata whenua, and the wider community and future generations. 2. Decisions, policy and planning reflect an integrated land management or ki uta ki tai approach to water resource management <u>and</u> land use planning. 3. Recognise and provide for the vision, objectives, and outcomes in Te Ara Whanui o Rangitaiki (Pathways of the Rangitaiki) and Te Kaupapa Kaitiaki documents and to 	<p>TKNT generally support policies 2.2.3 numbers 1-6 and recommend that the following wording/changes be adopted to enhance these further. That 2 further policies be included as submitted (Policy 2.2.3 - 7. & 8).</p>	Oppose	<p>Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>give effect to Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy for the Waikato River....</p> <p>5. Manage subdivision, use and development of land in a manner that restores, protects and enhances the mana, mauri, health and wellbeing of the District's lakes, rivers, <u>springs, wetlands</u> and all other waterways.</p> <p>6. <u>Recognise and provide for</u> the relationship of tangata whenua as mana whakahaere, kaitiaki and traditional users of waterbodies is respected, enhanced and supported.</p> <p>7. <u>Manage freshwater ecosystems to ensure protection of indigenous biodiversity and trout.</u></p> <p>8. <u>Recognise that freshwater bodies provide for traditional rituals and spiritual, physical and psychological well-being and sustenance.</u></p>			
2.2.3 Policy - OS115.8	4. That the concept 'fragmented development' not be used to characterise developments on Maori land or to prohibit or constrain the customary rights of mana whenua in utilising their lands.	The following submissions are made in respect of Policy 2.3.3	Oppose in part	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>5. That 'limiting criteria' include explicit criteria sets that provide for adequate protection of freshwater bodies consistent with the requirements under Te Mana o te Wai and Te Kaupapa Kaitiaki.</p> <p>6. That in addition to the requirement to demonstrate beneficial social and cultural outcomes, explicit consideration be provided for the desired outcomes and values within Te Kaupapa Kaitiaki.</p> <p>7. That TKNT support this policy and recommend further that TDC express that the provision of Papakainga for the occupation by mana whenua on their ancestral lands is a fundamental human right.</p> <p>10. That TKNT generally support Policy 2.3.3 (10) and recommend the addition of specified limits be introduced to prevent the adverse effects of urban development on the health and well-being of te taiao, its ecosystems and to communities including iwi/hapu/whanau within the district and beyond.</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.5.2 Objectives - OS115.11	That the proposed Objectives 2.5.2, 1. and 4. be modified as follows: 1. The wider benefits and strategic importance of nationally and regionally significant infrastructure to the District and wider, including the economic, cultural and social wellbeing of people and communities and for their health and safety, are recognised in decision making and land use planning. <u>(Note that the reference to benefits is already contained in Objective 2).</u> 4. Local and national transport infrastructure located in the Taupo District <u>protects the health and well-being of te taiao, taonga tuku iho, tangata whenua and the community and</u> operates in a safe and effective manner.	TKNT submit that the additional objective(s) be included in the sub-section to enable protection of the health and well-being of iwi/hapu/whanau Maori landowners and the community and the health and well-being of te taiao and taonga tuku iho of the Taupo District and are recognised and provided for in decision-making and land use planning.	Support in part	Support in part - could include wider community to clarify the statement that it is protecting all of the Taupo community.
2.5.3 Policy - OS115.12	That a separate policy be provided acknowledge the risks that infrastructure development and operation has on te oranga o te taiao, te oranga o nga taonga tuku iho, te oranga o te tangata and to enable their protection.	The risks that infrastructure development and operation has on te oranga o te taiao, te oranga o nga taonga tuku iho, te oranga o te tangata need to be acknowledged.	Oppose	Manawa Energy opposes this submission as - we require a greater degree of clarification the practical menaing of te oranga o te taiao, te oranga o nga taonga tuku iho, te oranga o te tangata in Council's definitions

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.5.3 Policy - OS115.33	That policy 2.5.3 - 1. be modified as follows to reflect the concerns in the statement and the recommended objectives: 1. Recognise and provide for the national, regional and local benefits of renewable energy generation activities and resources, and transmission activities, in relation to climate change <u>and</u> security of supply, and social, and economic wellbeing of people and communities and for their health and safety.	TKNT seeks policy 2.5.3 - 1. be modified as follows to reflect concerns.	Oppose	Manawa Energy opposes - The wording proposed does not align with the NPS-REG that states that REG has benefit for social, and economic wellbeing pf people and communities.
Plan Change 42 – Rural Environment				
NZ Defence Force – Lucy Edwards				
General Rural and Rural Lifestyle Environments - OS9.6	Include the following new policy, or words to similar effect: <u>Allow temporary activities provided that their effects are appropriately managed.</u>	The general rural and rural lifestyle environment chapters contain permitted activity rules for temporary activities, but no supporting objectives and policies.	Support	Manawa Energy supports this submission.
Douglas Wallace				
4b.4.12 Maximum Artificial Light Level - OS11.3	Amend so no artificial light to be seen	Artificial light should not be seen in rural, as artificial light is urban not rural.	Oppose	Manawa Energy opposes this submission, renewable electricity generation has a functional and operational need to be in rural areas

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				and health and safety may require artificial light to be on.
NZ Pork Industry Board – Hannah Ritchie				
Objective 3b.2.1 Enable Primary Production - OS22.5	Include definition of primary production within the plan change.	Submitter supports this section in part, but seeks the addition of a definition for Primary Production as per the National Planning Standards.	Support	Manawa Energy supports this submission.
Objective 3b.2.5 Avoidance of reverse sensitivity - OS22.8	Submitter supports the objective but it should specifically link back to not constraining the operation of primary production. Submitter seeks amendment as follows: <u>Reverse sensitivity effects on permitted and legally established Primary Production activities within the General Rural Environment, including conflict with activities in neighboring Environments, are avoided.</u> Amend objective as follows: Reverse sensitivity effects on permitted and legally established Primary Production activities within the General Rural Environment, including conflict with activities in neighboring Environments, are avoided.	Support an objective of avoiding reverse sensitivity, but this should specifically link back to not constraining the operation of primary production activities within the environment, as this is the primary function of the zone. This should also be supported by a specific rule framework to managed defined sensitive activities.	Oppose	Manawa Energy opposes this position as there are other established and lawful activities that have a functional and operational need to be in the rural environment.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Horticulture NZ – Sarah Cameron				
Amendments to the Definitions of the Taupo District Plan Section 10 - OS26	<p><u>Amend the definition of Rural Industry: Means industry or business undertaken in a rural environment an activity that directly supports, services, or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, dairy farming and geothermal/electricity generation.</u></p>	Definition doesn't align with the National Planning Standards.	Support in part	Manawa Energy in part supports this position as renewable electricity generation is not a rural industry. However, renewable electricity has a functional and operational need to be in the rural environment.
Amendments to the Definitions of the Taupo District Plan Section 10 - OS26.4	<p>Amend to include a definition of 'ancillary rural earthworks'</p> <p><u>Ancillary rural earthworks means earthworks associated with primary production, such as:</u></p> <p><u>a. maintenance of drains, troughs and installation of their associated pipe networks, drilling bores and offal pits, burying of dead stock and plant waste, erosion and sediment control measures</u></p> <p><u>b. the burying of material infected by unwanted organisms as declared by the Ministry of</u></p>	There is a need to provide for 'day-to-day' activities that are integral to productive land use in the rural zone. In HortNZ's experience, providing a definition for ancillary rural earthworks and a clear rule framework is an efficient approach.	Support in part	Manawa Energy in part supports this position as renewable electricity generation has a need for ancillary earthworks. However, renewable electricity has a functional and operational need to be in the rural environment.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993.</u></p> <p>Note: For clarity, it is noted that cultivation is not 'defined as earthworks'.</p>			
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS26.10</p>	<p>Include definition in consideration to National Policy Statement Highly Productive Land</p>	<p>The submitter seeks a new definition for Highly productive land consistent with the NPS for Highly Productive Land.</p>	<p>Support</p>	<p>Manawa Energy supports this position as the Taupo DC should give effect to all existing NPS documents.</p>
Mercury – Hayley Stonge				
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS68.12</p>	<p>Amend the definition of Rural Industry as follows. Rural Industry – an activity that directly supports, services, or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, <u>and</u> dairy farming and geothermal/electricity generation.</p>	<p>Mercury opposes the inclusion of “geothermal / electricity generation” within the definition of Rural Industry. Renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS68.13</p>	<p>Insert a new definition for Renewable Electricity Generation activities as follows. Renewable Electricity Generation activities means <u>the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.</u></p>	<p>Due to the nature of the following submissions by Mercury, two additional definitions need to be included in the Taupo District Plan. The proposed new definition of Renewable Electricity Generation activities, is the same definition as in the NPS-REG.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>
<p>3b.1 Introduction - OS68.14</p>	<p>Amend the Introduction to Chapter 3b.1 as follows: ... General Rural Environment ...Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy <u>sources</u> and plantation forestry activities, with dispersed buildings and rural roads... The purpose of separating the</p>	<p>Mercury generally supports the introductory statement but seeks minor changes to recognise the importance and functional need for renewable electricity generation to occur within the Rural Environment, its contribution to the regional economy and New Zealand's security of electricity supply. These changes also reflect the need to ensure that renewable electricity generation</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land <u>and other natural resources</u> within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for, yet allowing appropriate development to occur while preserving the rural character of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, <u>renewable electricity generation activities</u>, and rural industry, meaning an activity <u>being activities</u> that directly supports, services, or is are dependent on primary production and or <u>has</u> a locational <u>or functional</u> need to be within the General Rural Environment (rather than an urban environment).</p> <p>Primary production a Activities in the General Rural Environment will produce effects that are different from urban areas,...</p> <p>The General Rural Environment provisions seek to limit the scale of</p>	<p>activities are protected from potential reverse sensitivity effects (such as housing, visitor accommodation and lifestyle development both within the General Rural Environment and the new Rural Lifestyle Environment), and that if sensitive and incompatible activities do establish, they do not constrain the ability of renewable electricity generation activities to continue operating efficiently and effectively.</p>		

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>commercial and industrial activities unless they are dependent on primary production and/or have a locational <u>functional or operational</u> need to be within the General Rural Environment....</p> <p>Rural Lifestyle Environment</p> <p>... By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property sizes, whilst retaining separation from the rural production <u>and other</u> activities predominating in the General Rural Environment. ... By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics <u>rural character</u> and <u>the</u> productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.</p> <p>...The Rural Lifestyle Environment areas are located closer <u>in proximity</u> to urban areas to allow for access to community facilities within the district's townships</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.2.1 Enable Primary Production - OS68.15	Retain Objective 3b.2.1 with amendments. Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources <u>Primary production and the use of natural resources</u> are enabled by protecting the availability of the rural land <u>and other</u> resources and <u>its</u> <u>their</u> productive capability.	Mercury supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just “primary production”. In accordance with s75(3) of the RMA District objectives and policies must give effect to existing RPS objectives and policies.	Support	Manawa Energy supports this submission.
Objective 3b.2.2 Maintaining the established General Rural character - OS68.16	Amend Objective 3b.2.2 to read: Objective 3b.2.2 Maintaining the established General Rural character The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided. <u>Enable a range of activities in the General Rural Environment that are compatible with rural character.</u>	Mercury is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, an objective that seeks to maintain the “established character” is essentially seeking no change. The objective seeks to <u>avoid</u> “incremental subdivision and development” which essentially locks in the status quo and will make it difficult for any new development to occur, including new development that has been identified in other planning provision as being	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		appropriately located in the General Rural Environment.		
Objective 3b.2.3 Rural industry - OS68.17	Retain Objective 3b.2.3. Insert a new objective following Objective 3b.2.3 as follows: <u>Objective 3b.2.X Renewable Electricity Generation and Transmission Activities</u> <u>Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.</u>	Due to its elevated status under the NPS-REG, Mercury's earlier submission point (above) seeks that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be included in the Plan. Consistent with that request, and for the same reasons, , a new objective needs to be included in the Plan to enable renewable electricity generation activities (and transmission activities by association).	Support	Manawa Energy supports this submission.
Objective 3b.2.4 Other activities - OS68.18	Provided that new Objective 3b.2.X is added as requested above, amend Objective 3b.2.4 as follows: <u>Objective 3b.2.4 Other activities</u> Maori cultural activities, tourism activities, <u>and</u> visitor accommodation and renewable electricity generation and transmission activities are enabled in <u>appropriate locations within</u> the General Rural Environment.	As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity generation activities), Objective 3b.2.4 needs to be amended to remove the reference to renewable electricity generation (and transmission by association). Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		that enabled anywhere including in locations whereby reverse sensitivities could arise.		
Objective 3b.2.5 Avoidance of reverse sensitivity - OS68.19	Amend Objective 3b.2.5 as follows: Objective 3b.2.5 Avoidance of reverse sensitivity Reverse sensitivity effects on permitted, and legally established, <u>and/or consented</u> activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.	Mercury supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Mercury is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already <i>exists</i> . This is particularly concerning for Mercury. The objective needs to also cover consented activities which have yet to be constructed / undertaken.	Support	Manawa Energy supports this submission.
Objective 3b.2.6 Impacts on infrastructure - OS68.20	Amend Objective 3b.2.6 as follows: Objective 3b.2.6 Impacts on infrastructure The impacts on infrastructure arising from subdivision and development are managed <u>do not compromise the safe and efficient functioning of infrastructure</u> .	An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan.	Support	Manawa Energy supports this submission.
Policy 3b.2.9 Maintaining the	Amend Policy 3b.2.9 as follows: Policy 3b.2.9 Maintaining the established Rural character	Mercury is of the view that Policy 3b.2.9 is misguided and seeks to achieve the wrong outcome. The	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
established character - OS68.21	<p>Enable activities in the Maintain the established General Rural Environment <u>that will not compromise the character of the General Rural Environment</u>, as defined by:</p> <ul style="list-style-type: none"> a) <u>Extensive pastoral farming and forestry</u> b) <u>Renewable Electricity Generation Activities</u> c) <u>Geothermal areas and activities, electricity transmission and distribution</u> ad) Large open spaces between built structures be) A mix of residential and rural industry buildings e) Noises related to production activities during the day but low levels of noise at night d) Low levels of light spill f) <u>Effects from activities including noise, vibration, dust, odour and visual effects</u> eg) Infrequent vehicle movements to and from a site fh) Limited signage that directly relates to the activity operating on the site. 	<p>policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 21 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupo District. The rural environment does experience significant vehicle movements, noise and light spill associated with primary production activities, renewable electricity generation and rural industry activities. Accordingly Mercury proposes some clause deletions to ensure the policy is realistic</p>		

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Policy 3b.2.10 Residential units - OS68.22	<p>Amend Policy 3b.2.10 as follows:</p> <p>Policy 3b.2.10 Residential units</p> <p>Avoid the cumulative effects of rural lifestyle development by <u>providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment</u> that:</p> <p>a) Increase the demand for community infrastructure and services</p> <p>b) Result in the inefficient use of land or loss of future flexibility for productive uses</p> <p>c) Erode the general rural character through its density, scale and location-</p> <p>d) <u>Result in the potential to generate reverse sensitivity effects.</u></p> <p>e) <u>Constrain the ability to access or utilise renewable energy resources.</u></p>	Mercury supports Policy 3b.2.10 but it needs to be expanded to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).	Support	Manawa Energy supports this submission.
Policy 3b.2.12 Minor residential unit - OS68.23	<p>Amend Policy 3b.2.12 as follows:</p> <p>Policy 3b.2.12 Minor residential unit</p> <p>Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not</p>	It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment. A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	be compromised <u>and to avoid the potential for reverse sensitivity effects</u>	Environment) from the boundary with the General Rural Environment.		
Policy 3b.2.13 Avoiding reverse sensitivity - OS68.24	Amend Policy 3b.2.13 as follows: Policy 3b.2.13 Avoiding reverse sensitivity Any adverse effects generated by <u>an new</u> sensitive activity must be located and managed within the allotment so as to avoid adversely affecting <u>reverse sensitivity effects</u> on permitted, and lawfully established and/or consented neighbouring activities.	Mercury supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. Mercury seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.	Support	Manawa Energy supports this submission.
Policy 3b.2.14 Commercial and industrial activity - OS68.25	Amend Policy 3b.2.14 as follows: Policy 3b.2.14 Commercial and industrial activity Limit the scale of commercial and industrial activity (<u>excluding renewable electricity generation activities</u>) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production <u>and other activities provided for</u> within the General Rural Environment	Because renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities. Mercury supports the intent of the policy, but it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Policy 3b.2.15 Allotment size - OS68.26	Retain Policy 3b.2.15.	Mercury supports Policy 3b.2.15 on the basis that it reinforces the intension that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities)	Support	Manawa Energy supports this submission.
Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment - OS68.27	Delete Objective 3b.3.1 and replace it with the following: <u>Objective 3b.3.1 Enable Rural Residential Activities</u> <u>Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.</u>	The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments). If Rural Lifestyle Environment are proposed in inappropriate locations (and no decision is made to amend that situation), it forces Mercury (and other parties) to seek to amend the rules and performance standards within the Rural Lifestyle Environment as an alternative means to avoid the creation of reverse sensitivity effects. It is preferable that only appropriate locations are zoned Rural Lifestyle Environment whereby activities occurring within those zones do not need to be constrained by way of the rules and performance standards	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.3.2 Avoid reverse sensitivity - OS68.28	Amend Objective 3b.3.2 as follows: Objective 3b.3.2 Avoid reverse sensitivity Adverse reverse sensitivity effects, including conflict with on permitted, and legally established <u>and/or consented</u> activities in neighbouring Environments, are avoided.	Mercury supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Mercury is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already <i>exists</i> . This is particularly concerning for Mercury. The objective needs to also cover consented activities which have yet to be constructed / undertaken.	Support	Manawa Energy supports this submission.
Objective 3b.3.3 Commercial and industrial activities - OS68.29	Amend Objective 3b.3.3 as follows: Objective 3b.3.3 Commercial and industrial activities The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the <u>Rural Lifestyle Environment</u> are avoided.	Mercury supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity.	Support	Manawa Energy supports this submission.
Objective 3b.3.4 Consolidate rural lifestyle activities - OS68.30	Retain Objective 3b.3.4.	Mercury supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.3.6 Impacts on community infrastructure - OS68.31	Amend Objective 3b.3.6 as follows: Objective 3b.2.6 Impacts on community infrastructure The impacts on community infrastructure arising from subdivision and development are managed <u>do not compromise the safe and efficient functioning of infrastructure.</u>	An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan. The objective should apply to all infrastructure, not just community infrastructure. These amendments are considered necessary so that there is a policy which achieves Objective 3b.3.2 (avoid reverse sensitivity).		
Policy 3b.3.9 Character of the Rural Lifestyle Environment - OS68.32	Add a new point i) to Policy 3b.3.9 as follows: <u>i) An environment that is surrounded by a working rural environment including rural production, geothermal areas and renewable electricity generation activities.</u>	Mercury supports Policy 3b.3.9 but it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.	Support	Manawa Energy supports this submission.
Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the	Retain Policy 3b.3.10	Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
General Rural Environment - OS68.33		reverse sensitivity effects. Mercury therefore supports this policy on this basis. However, Mercury reiterates that these two measures alone will not always avoid the potential for reverse sensitivity effects (which is what new Objective 3b.3.2 requires), and this needs to be reflected across several policies within this sub-chapter.		
Policy 3b.3.12 Minor residential unit - OS68.34	Amend Policy 3b.3.12 as follows: Policy 3b.3.12 Minor residential unit Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to further protect the character of the R rural Lifestyle Environment. <u>and to avoid reverse sensitivity effects.</u>	A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment. It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.	Support	Manawa Energy supports this submission.
4b.1.1 Activities in the General Rural Environment - OS68.35	Retain Rule 4b.1.1.	Mercury supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.1.2 Minor residential units - OS68.36	<p>Add new matter of discretion as 4b.1.2(i) as follows:</p> <p>...</p> <p>When considering activities under Rule 4b.1.2 Council restricts the exercise of its discretion to the following matters:</p> <p>a....</p> <p>f. The ability to mitigate <u>avoid</u> adverse effects, <u>including reverse sensitivity effects</u>, through the use of screening, planting, landscaping, and <u>alternative design, and/or other means including restrictive covenants.</u></p> <p>g. Proposed methods for the avoidance, remedying or mitigation of potential adverse effects, and the degree to which they would be successful</p> <p>h. The likelihood of future subdivision which results in the minor residential unit being on a separate allotment to the primary residential unit.</p> <p>i. <u>The potential to constrain access to and/or the utilisation of renewable energy sources.</u></p>	<p>Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects. An additional criterion has been added to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.1.3 Temporary Activities - OS68.37	Retain Rule 4b.1.3.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields - OS68.38	<p>Retain Rule 4b.1.4, and amend it as follows, including new clause (ii).</p> <p>4b.1.4 Electricity Generation Core Sites, Renewable Electricity Energy Generation Activities and Geothermal Areas Steamfields</p> <p>i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal areas steamfield, renewable energy <u>electricity</u> generation activities and associated structures and ancillary activities is a permitted activity.</p> <p>ii) <u>Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.</u></p> <p>NOTE: For the purpose of this rule "maintenance" means: All activities associated with the protective care, and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to</p>	<p>Mercury supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for the operation, maintenance and minor upgrading of renewable electricity generation activities in the General Rural Environment.</p> <p>The term "Geothermal Areas" has been used rather than "Geothermal Steamfields" due to Section O of the Plan identifying and mapping Geothermal Areas.</p> <p>A second clause is requested to be added to the rule on the basis of Policy G of NPS-REG.</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>monitor, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation of <u>all associated structures</u> and includes maintenance of surrounds and water areas.</p> <p>NOTE: For the purpose of this rule "minor upgrading" means: Structural improvement, repair and replacement <u>or upgrade of components, or activities required for the continued safe and efficient operation including worn or technically deficient parts of any structure including the</u> powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures of similar character and scale, and includes associated drilling, <u>vehicles, infrastructure, machinery,</u> testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures. up to 100m2 in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	communication dish not exceeding 5m2 in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.			
4b.1.5 Commercial and industrial activities, and home businesses, - OS68.39	Amend Rule 4b.1.5 as follows: i.... When considering activities under Rule 4b.1.5ii Council restricts the exercise of its discretion to the following matters: a. The daily vehicle movements expected to and from the allotment. b. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects. c. The effect of the activity on surrounding land uses (<u>including reverse sensitivity effects</u>) and how these effects can be managed onsite and/or mitigated...	Home businesses could include sensitive activities and need to avoid creating reverse sensitivity effects.	Support	Manawa Energy supports this submission.
4b.1.7 High voltage	Amend Rule 4b.1.7. as follows: 4b.1.7 Buildings and Structures in	Mercury supports this rule as it seeks to ensure the safe operation of	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
transmission lines - OS68.40	<p><u>proximity to High voltage transmission lines</u></p> <p>i. Any building or structure (except network utilities and Renewable Electricity Generation Activities) located within 0 – 12 meters of a high-voltage transmission line is a restricted discretionary activity.</p>	transmission lines, through the management of risk associated with structures in close proximity to high voltage infrastructure. Electricity generation is not a network utilities, so needs an exclusion to avoid unnecessary consents.		
4b.1.8 Buildings within Outstanding Landscape Areas - OS68.41	<p>Retain Rule 4b.1.8 but amend the first exception to the rule as follows:</p> <p>EXCEPTION: This rule will not apply to the erection of structures:</p> <p>a. <u>Associated with existing renewable electricity generation activities including Wwithin Electricity Generation Core Sites.</u></p> <p>b. ...</p>	Mercury supports this exception as we agree that this RDA rule should not apply to structures within Electricity Generation Core Sites. However, there is no reason why this exception should not apply to all other existing renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.1.9 Earthworks within Outstanding Landscape Areas - OS68.42	<p>Retain 4b.1.9 but amend the exception as follows: EXCEPTION: This rule will not apply to Earthworks <u>associated with existing and consented renewable electricity generation activities including within Electricity Generation Core Sites</u></p>	Mercury supports this exception as we agree that this RDA rule should not apply to earthworks within Electricity Generation Core Sites. However, we consider that the exception should be extended to include other existing and consented renewable electricity generation activities.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.2.1 Vehicle movements - OS68.43	Retain 4b.2.1 but amend the exception as follows: EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and consented renewable electricity generation activities.</u>	Mercury supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.5 Maximum building height - OS68.44	<p>Amend Rule 4b.2.5 as follows: 4b.2.5 Maximum building height i.... iv. 15 meters for <u>renewable Electricity Generation activities</u> on land identified as a Geothermal Area in Section O within an Electricity Generation Core Site.</p> <p>EXCEPTIONS:</p> <ul style="list-style-type: none"> · <u>Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators including wind monitoring masts – no height limit</u> · Cranes being used as part of any construction or maintenance works for the duration of the works – no height limit. 	Mercury seeks amendments to Rule 4b.2.5 to make the rule applicable to all renewable electricity generation activities within Geothermal Areas. Activities of this nature tend to be temporary activity and any effects are easily remediated. An additional exception has been added to the rule on the basis of Policy G of NPS-REG.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<ul style="list-style-type: none"> · Drilling Rigs for up to 60 days per well allotment – no height limit. 			
4b.2.6 Minimum building setbacks - OS68.45	<p>Amend Rule 4b.2.6 as follows: 4b.2.6 Minimum building setbacks</p> <p>i....</p> <p>v. There shall be no front boundary setback for buildings and activities associated with Electricity Generation and Renewable Energy <u>Electricity Generation Activities</u> on land identified as Geothermal Area in Section O within an Electricity Generation Core Site where the road extends over any power generation Building or Structure.</p> <p>vi. There shall be no boundary setback for buildings and activities associated with <u>Renewable Electricity Generation Activities</u> on land identified as Geothermal Area in Section O <u>including</u> within an Electricity Generation Core Site</p> <p>EXCEPTIONS:</p> <ul style="list-style-type: none"> · For the purpose of this performance standard water tanks are not required to comply with the setback requirements in this standard. 	Mercury seeks minor amendments to Rule 4b.2.6 to make it more accurate and workable.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.2.7 Minor residential units - OS68.46	<p>Amend Rule 4b.2.7 as follows and to add a new clause (c): 4b.2.7 Minor residential units</p> <p>A maximum of one minor residential unit per primary residential unit per allotment.</p> <p>i. All minor residential <u>units</u> or accommodation activity units shall:</p> <p>a. Be no larger than 100m² in size</p> <p>b. Be located no greater than 20 metres from the primary residential unit.</p> <p>c. <u>Be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more than 300m away from any aforementioned Consent Area.</u></p> <p> €.d. Share an accessway/driveway with the primary residential unit.</p> <p>...</p>	<p>Minor residential units need to be located so that they do not create additional restrictions on renewable electricity generation activities by, for example, moving a point of noise compliance closer to the source of noise.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.2.8 Commercial and industrial activities, and home businesses units - OS68.47	<p>Amend Rule 4b.2.8 by including a new clause (iii) as below:</p> <p>4b.2.8 Commercial and industrial activities, and home businesses</p> <p>i. ...</p> <p>iii. Home businesses shall be <u>located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more that 300m away from any aforementioned Consent Area.</u></p> <p>...</p>	Home businesses need to be located so that they do not create additional restrictions on renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.13 Maximum Noise – Other - OS68.48	<p>Amend Rule 4b.2.13 as follows: 4b.2.13 Maximum Noise – Other</p> <p>i. ...</p> <p>ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, <u>bursting discs, emergency or upset operating conditions</u> and hydro spills associated with the operation of <u>Renewable</u> Electricity Generation</p>	Mercury supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>Activities Core-sites</u> . Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.			
4b.2.15 Signage - OS68.49	Retain Rule 4b.2.15.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.1 Subdivision - General Rural Environment - OS68.50	Retain Rule 4b.5.1 subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).	Mercury supports this rule subject to an additional matter of control as set out in Rule 4b.5.3.	Support	Manawa Energy supports this submission.
4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment - OS68.51	Amend Rule 4b.5.3 to include an additional matter of control as 4b.5.3(i) as follows: For the purposes of Rules 4b.5.1.i, 4b.5.2.i and 4b.5.3.i the matters over which the Council reserves control for the purpose of assessment are: a).. i) <u>Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.</u>	Mercury supports the inclusion of an additional matter over which control is reserved for controlled activities.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.5.4 Subdivision - Default Activity Status - OS68.52	Retain Rule 4b.5.4.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.5 Subdivision resulting in a new public road, or extension of existing public road - OS68.53	Retain Rule 4b.5.5	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.5 Subdivision resulting in a new public road, or extension of existing public road - OS68.54	Retain Rule 4b.5.5.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.7 Subdivision - Outstanding Landscape Areas - OS68.55	Retain Rule 4b.5.7.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.8 Subdivision - Bonus Lots - OS68.56	Retain Rule 4b.5.8.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.9 Subdivision - More than 12 allotments - OS68.57	Retain Rule 4b.5.9.	Mercury supports this rule.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
General Rural and Rural Lifestyle Environments - OS68.58	Amend rule 4e.2.1 as follows: 4e.2.1 Foreshore Protection ... i. EXCEPTION: Electricity Generation Core Sites (as identified on the planning maps) – permitted activity where in accordance with Rule 4b.2.4 4e.2.1 and where located no more than 100 metres from any existing structure associated with power generation.	As a consequential change to the relief sought rule 4e.2.1 Foreshore Protection, must be edited to remove the reference to rule 4b.2.4 which no longer relates. Rule 4e.2.1 Foreshore Protection, must be edited to refer to rule 4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Areas	Support	Manawa Energy supports this submission.
4b.2.9 Maximum Noise – Limits - OS68.59	Retain 4b.2.9	Mercury supports this rule	Support	Manawa Energy supports this submission.
4b.2.10 Maximum Noise - Construction Noise - OS68.60	Retain 4b.2.10	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.2.11 Maximum Noise - Electricity Generation Core Sites - OS68.61	Retain 4b.2.11	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.2.12 Maximum Noise - Well Drilling and Testing - OS68.62	Retain 4b.2.12	Mercury supports this rule	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Amendments to the Definitions of the Taupo District Plan Section 10 - OS68.63	<p>Insert a new definition of Renewable Electricity Generation as follows (being the same definition in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG):</p> <p><u>Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.</u></p>	Submitter seeks a new definition of Renewable Electricity Generation (being the same definition in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG).	Support	Manawa Energy supports this submission.
Amendments to the Definitions of the Taupo District Plan Section 10 - OS68.64	<p>Insert a new definition for Reverse Sensitivity as follows:</p> <p><u>Reverse sensitivity is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.</u></p>	Submitter seeks a new definition of Reverse Sensitivity which is the same definition as in the Waikato RPS.	Support	Manawa Energy supports this submission.
Balance Agri-Nutrients – Dominic Adams				

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Amendments to the Definitions of the Taupo District Plan Section 10 - OS78.3	Replace definition of Rural Industry with the NPS definition: <u>Rural Industry: means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.</u>	Ballance notes that the definition of Rural Industry is not as per the National Planning Standards definition and seeks that the definition is revised to align with the National Planning Standards.	Support	Manawa Energy supports this submission.
Objective 3b.2.5 Avoidance of reverse sensitivity - OS78.5	Retain the objective.	Ballance supports the protection of permitted and legally established activities from the effects of reverse sensitivity. "Reverse sensitivity effects on permitted and legally established activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided."	Support	Manawa Energy supports this submission.
Genesis Energy – Alice Lin				
Amendments to the Definitions of the Taupo District Plan Section 10 - OS84.11	Amend the definition of Rural Industry as shown, and insert new definitions of "Renewable Electricity Generation" and "Renewable Electricity Generation Activities" (being the same definitions in the NPS-REG). Rural Industry – an activity that directly supports, services, or is dependent on primary production	Genesis opposes the inclusion of "geothermal / electricity generation" within the definition of Rural Industry. The proposed definition is inconsistent with the National Planning Standard 2019 (NP Standard) definition for Rural Industry.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, <u>and dairy farming</u> and geothermal/electricity generation.</p>			
3b.1 Introduction - OS84.12	<p>Retain 3b.1 Introduction subject to amendments below:</p> <p>General Rural Environment The General Rural Environment Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy <u>sources</u> and plantation forestry activities, with dispersed buildings and rural roads....</p> <p>The purpose of separating the General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land <u>and other natural resources</u> within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for, yet allowing appropriate development to occur while</p>	<p>As previously identified, the TPS within the Rural Environment is also identified by the EGCS. Whilst this arrangement in the Taupo District Plan has generally served well for the TPS, in the context of the emerging climate change challenges, Genesis considers more enabling framework is necessary in the form of a dedicated Energy Chapter.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>preserving the 'openness'-<u>rural character</u> of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, <u>renewable electricity generation activities</u>, and rural industry, meaning an activity being activities that directly supports, services, or is are dependent on primary production and/<u>or</u> <u>has</u> a locational <u>or functional</u> need to be within the General Rural Environment (rather than an urban environment).</p> <p>Primary production <u>Activities</u> in the General Rural Environment will produce effects that are different from urban areas, such as ...</p> <p>The General Rural Environment provisions seek to limit the scale of commercial and industrial activities unless they are dependent on primary production and/<u>or</u> have a <u>locational functional or operational</u> need to be within the General Rural Environment...</p> <p>Rural Lifestyle Environment ... By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>sizes, whilst retaining separation from the rural production <u>and other</u> activities <u>predominating</u> in the General Rural Environment. This separation of activities serves to minimise reverse sensitivity issues. By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve <u>the open space characteristics rural character</u> and <u>the</u> productive potential of the rest of the Rural Environment...</p> <p>...The Rural Lifestyle Environment areas are located <u>closer in proximity</u> to urban areas to allow for access to community facilities within the district's townships.</p>			
Objective 3b.2.1 Enable Primary Production - OS84.13	<p>Retain Objective 3b.2.1 subject to amendments below.</p> <p>Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources</p> <p>Primary production <u>and the use of natural resources</u> is enabled by protecting the availability of <u>the</u> rural land <u>and other</u> resources <u>and its</u> <u>their</u> productive capability.</p>	Genesis supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just "primary production".	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.2.2 Maintaining the established General Rural character - OS84.14	Amend Objective 3b.2.2 as shown below: Objective 3b.2.2 Maintaining the established General Rural character The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided. <u>Enable a range of productive activities in the General Rural Environment that are compatible with rural character.</u>	Genesis is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be "maintained". Secondly, an objective that seeks to maintain the "established character" is essentially seeking no change.	Support	Manawa Energy supports this submission.
Objective 3b.2.3 Rural industry - OS84.15	Retain Objective 3b.2.3 as notified, and insert a new objective following Objective 3b.2.3 as follows: Objective 3b.2.X Renewable Electricity Generation and Transmission Activities <u>Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.</u>	Due to its elevated status under the NPS-REG, Genesis has sought (above) that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation be including in the Plan. In line with that outcome, a new objective needs to be included in the Plan seeking to enable renewable electricity generation activities (and transmission activities by association).	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.2.4 Other activities - OS84.16	Amend Objective 3b.2.4 as follows: Objective 3b.2.4 Other activities Maori cultural activities, tourism activities, <u>and</u> visitor accommodation and renewable electricity generation and transmission activities are enabled in <u>appropriate locations within</u> the General Rural Environment.	Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather than enabled anywhere including in locations whereby reverse sensitivities could arise.	Support	Manawa Energy supports this submission.
Objective 3b.2.5 Avoidance of reverse sensitivity - OS84.17	Amend Objective 3b.2.5 as follows: Objective 3b.2.5 Avoidance of reverse sensitivity Reverse sensitivity effects on permitted, and legally established, <u>and/or consented</u> activities within the General Rural Environment...	Genesis supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Genesis is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already exists. The objective needs to also cover consented activities which have yet to be constructed / undertaken.	Support	Manawa Energy supports this submission.
Objective 3b.2.6 Impacts on infrastructure - OS84.18	Amend Objective 3b.2.6 as follows: Objective 3b.2.6 Impacts on infrastructure The impacts on infrastructure arising from subdivision and development are managed <u>do not</u>	Genesis considers an objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>compromise the safe and efficient functioning of infrastructure.</u>			
Policy 3b.2.9 Maintaining the established character - OS84.19	<p>Amend Policy 3b.2.9 as follows: Policy 3b.2.9 Maintaining the established Rural character Enable activities in the Maintain the established General Rural Environment <u>that will not compromise the character of the General Rural Environment</u>, as defined by:</p> <ul style="list-style-type: none"> a) <u>Extensive pastoral farming and forestry</u> b) <u>Renewable electricity generation activities</u> c) <u>Geothermal steamfields, electricity transmission and distribution</u> ad) Large open spaces between built structures be) A mix of residential and rural industry buildings e) Noises related to production activities during the day but low levels of noise at night d) <u>Low levels of light spill</u> f) <u>Effects from activities including noise, vibration, odour and visual effects</u> e) Infrequent vehicle movements to 	Genesis opposes Policy 3b.2.9 for the same reasons it opposes Objective 3b.2.2. The policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 20 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupo District.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	and from a site fg)...			
Policy 3b.2.10 Residential units - OS84.20	Amend Policy 3b.2.10 as follows: Policy 3b.2.10 Residential units Avoid the cumulative effects of rural lifestyle development by <u>providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment</u> that: a) ... c) Erode the general rural character through its density, scale and location- d) <u>Result in the potential to generate reverse sensitivity effects.</u> e) <u>Constrain the ability to access or utilise renewable energy resources.</u>	Genesis supports Policy 3b.2.10 but considers it needs to be expanding to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).	Support	Manawa Energy supports this submission.
Policy 3b.2.12 Minor residential unit - OS84.21	Amend Policy 3b.2.12 as follows: Policy 3b.2.12 Minor residential unit Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised <u>and to avoid the</u>	It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment. A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>potential for reverse sensitivity effects.</u>	Environment) from the boundary with the General Rural Environment.		
Policy 3b.2.13 Avoiding reverse sensitivity - OS84.22	Amend Policy 3b.2.13 as follows: Policy 3b.2.13 Avoiding reverse sensitivity Any adverse effects generated by <u>an new sensitive activity</u> must be managed within the allotment so as to avoid adversely affecting reverse sensitivity effects on <u>permitted, and lawfully established and/or consented</u> neighbouring activities.	Genesis supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. Genesis seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.	Support	Manawa Energy supports this submission.
Policy 3b.2.14 Commercial and industrial activity - OS84.23	Amend Policy 3b.2.14 as follows: Policy 3b.2.14 Commercial and industrial activity Limit the scale of commercial and industrial activity (<u>excluding renewable electricity generation activities</u>) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production <u>and other</u> activities <u>provided for</u> within the General Rural Environment.	Genesis supports the intent of the policy but considers it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Policy 3b.2.15 Allotment size - OS84.24	Retain Policy 3b.2.15 as notified.	Genesis supports Policy 3b.2.15 on the basis that it reinforces the intent that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities).	Support	Manawa Energy supports this submission.
Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment - OS84.25	Delete Objective 3b.3.1 and replace it with the following: Objective 3b.3.1 Enable Rural Residential Activities <u>Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.</u>	This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments).	Support	Manawa Energy supports this submission.
Objective 3b.3.2 Avoid reverse sensitivity - OS84.26	Amend Objective 3b.3.2 as follows: Objective 3b.3.2 Avoid reverse sensitivity Adverse reverse sensitivity effects, including conflict with on permitted, and legally established and/or consented activities in	Genesis supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Genesis is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already exists. The	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	neighbouring Environments, are avoided.	objective needs to also cover consented activities which have yet to be constructed / undertaken.		
Objective 3b.3.3 Commercial and industrial activities - OS84.27	Amend Objective 3b.3.3 as follows: Objective 3b.3.3 Commercial and industrial activities The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the <u>Rural Lifestyle Environment</u> are avoided.	Genesis supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity.	Support	Manawa Energy supports this submission.
Objective 3b.3.4 Consolidate rural lifestyle activities - OS84.28	Retain Objective 3b.3.4.	Genesis supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.	Support	Manawa Energy supports this submission.
Objective 3b.3.6 Impacts on community infrastructure - OS84.29	Amend Objective 3b.3.6 as follows: Objective 3b.2.6 Impacts on community infrastructure The impacts on community infrastructure arising from subdivision and development are managed do not compromise the	An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan. The objective should apply to all	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>safe and efficient functioning of infrastructure.</u>	infrastructure, not just community infrastructure.		
Policy 3b.3.9 Character of the Rural Lifestyle Environment - OS84.30	Add a new point i) to Policy 3b.3.9 as follows: Policy 3b.3.9 Character of the Rural Lifestyle Environment Manage the anticipated character of the Rural Lifestyle Environment as defined by: a) ... i) <u>An environment that is surrounded by a working rural environment including rural production, geothermal steamfields and renewable electricity generation activities.</u>	Genesis supports Policy 3b.3.9 but considers it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.	Support	Manawa Energy supports this submission.
Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment - OS84.31	Retain Policy 3b.3.10 as notified.	Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing reverse sensitivity effects. Genesis therefore supports this policy on this basis.	Support	Manawa Energy supports this submission.
Policy 3b.3.12 Minor residential unit - OS84.32	Amend Policy 3b.3.12 as follows: Policy 3b.3.12 Minor residential unit Manage the scale and location of	A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to further protect the character of the #Rural Lifestyle Environment, <u>and to avoid reverse sensitivity effects.</u></p>	<p>boundary with the General Rural Environment. It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.</p>		
<p>4b.1.1 Activities in the General Rural Environment - OS84.33</p>	<p>Retain Rule 4b.1.1 as notified.</p>	<p>Genesis supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>
<p>4b.1.2 Minor residential units - OS84.34</p>	<p>Retain Rule 4b.1.2 subject to the amendments below.</p> <p>f. The ability to mitigate <u>avoid</u> adverse effects, <u>including reverse sensitivity effects</u>, through the use of screening, planting, landscaping, and alternative design, <u>and/or other means including restrictive covenants.</u></p> <p>-</p> <p>i. <u>The potential to constrain access to and/or the utilisation of renewable energy sources.</u></p>	<p>Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects. The relevant matters of discretion should therefore consider any potential for reverse sensitivity effects. An additional criterion is also suggested to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields - OS84.35	<p>Amend Rule 4b.1.4 as follows:</p> <p>4b.1.4 Electricity Generation Core Sites, Renewable Energy <u>Electricity</u> Generation Activities and Geothermal Steamfields Areas</p> <p>i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal steamfields areas, renewable energy <u>electricity</u> generation activities and associated structures <u>and ancillary activities</u> is a permitted activity.</p> <p>NOTE: For the purpose of this rule “maintenance” means: All activities associated with the protective care, and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor, testing and/or arresting the processes of decay, structural fatigue, erosion or dilapidation <u>of all associated structures</u> and includes maintenance of surrounds and water areas.</p> <p>NOTE: For the purpose of this rule “minor upgrading” means: Structural improvement,</p>	Genesis supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for renewable electricity generation activities in the General Rural Environment.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>repair and replacement or <u>upgrade of components, or activities required for the continued safe and efficient operation</u> including worn or technically deficient parts of <u>any structure including the</u> powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures of similar character and scale, and includes associated drilling, <u>vehicles, infrastructure, machinery, testing, monitoring, earthworks and vegetation removal.</u> Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures up to 100m² in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.1.5 Commercial and industrial activities, and home businesses, - OS84.36	Retain Rule 4b.1.5 subject to the amendments below. ... When considering activities under Rule 4b.1.5ii Council restricts the exercise of its discretion to the following matters: c. The effect of the activity on surrounding land uses (<u>including reverse sensitivity effects</u>) and how these effects can be managed onsite and/or mitigated.	As home businesses could include sensitive activities, Genesis considered there is a need to avoid creating reverse sensitivity effects which should be a matter of discretion.	Support	Manawa Energy supports this submission.
4b.1.7 High voltage transmission lines - OS84.37	Retain Rule 4b.1.7 subject to the amendments shown: 4b.1.7 <u>Buildings and structures in proximity to High voltage transmission lines</u> i. Any building <u>or structure</u> (except network utilities <u>or renewable electricity generation activities</u>)...	Genesis supports this rule as it seeks to ensure the safe operation of transmission lines. However the heading of the rule needs to be more accurate and the rule needs to provide for renewable electricity generation activities (new definition included, which includes maintenance activities) which, by nature of the activity, are connected to the high-voltage network.	Support	Manawa Energy supports this submission.
4b.1.8 Buildings within Outstanding Landscape Areas - OS84.38	Retain Rule 4b.1.8 but amend the first exception to the rule as follows: ... is a restricted discretionary activity . EXCEPTION: This rule will not apply	Genesis supports this rule on the basis that it does not apply to buildings within Electricity Generation Core Sites. However, Genesis considers the exception should be broadened to include all other	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	to the erection of structures: a. <u>Associated with existing renewable electricity generation activities including W</u> within Electricity Generation Core Sites...	existing renewable electricity generation activities.		
4b.1.9 Earthworks within Outstanding Landscape Areas - OS84.39	Retain Rule 4b.1.9 but amend the exception to the rule as follows: ... EXCEPTION: This rule will not apply to Earthworks <u>associated with existing and consented renewable electricity generation activities including</u> within Electricity Generation Core Sites.	Genesis supports this rule on the basis that it does not apply to earthworks within Electricity Generation Core Sites. However, Genesis considers the exception should be broadened to include all other existing renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.1 Vehicle movements - OS84.40	Retain 4b.2.1 subject to the amendment below. ... This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and/or consented renewable electricity generation activities.</u>	Genesis supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.9 Maximum Noise – Limits - OS84.41	Retain 4b.2.9 as notified.	Genesis support performance standard 4b.2.9 as it retains the existing provision in the District Plan.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.2.10 Maximum Noise - Construction Noise - OS84.42	Retain 4b.2.10 as notified.	Genesis supports performance standard 4b.2.10 as the New Zealand Standard for construction noise is a well understood standard.	Support	Manawa Energy supports this submission.
4b.2.11 Maximum Noise - Electricity Generation Core Sites - OS84.43	Retain 4b.2.11 as notified.	Genesis supports performance standard 4b.2.11 as it retains the existing provision in the District Plan.	Support	Manawa Energy supports this submission.
4b.2.13 Maximum Noise – Other - OS84.44	<p>Amend Rule 4b.2.13 as follows:</p> <p>4b.2.13 Maximum Noise – Other</p> <p>i. ...91</p> <p>ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, <u>bursting discs, emergency or upset operating conditions</u> and hydro spills associated with the operation of <u>Renewable Electricity Generation Activities Core sites</u>. Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.</p>	Genesis supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.	Support	Manawa Energy supports this submission.
4b.5.3 Subdivision - Rural Lifestyle Environment that	Amend Rule 4b.5.3 as follows: ... For the purposes of Rules 4b.5.1.i, 4b.5.2.i and 4b.5.3.i the matters over which the Council	Genesis supports this rule with the inclusion of an additional matter over	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
does not adjoin the General Rural Environment - OS84.45	<p>reserves control for the purpose of assessment are:</p> <p>...</p> <p><u>i) Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.</u></p>	which control is reserved for controlled activities.		
General Rural and Rural Lifestyle Environments - OS84.46	<p>Genesis seeks the relief set out under each relevant provision. To the extent that any of the relief sought is not accepted, Genesis seeks any alternative relief which will have the same or similar effect.</p>	<p>Genesis generally supports the creation of the Rural Lifestyle Environment on the basis that they can provide for rural residential activities in appropriate locations, which do not include within or in close proximity to permitted, lawfully existing and/or consented renewable electricity generation activities. If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need for Genesis (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to avoid reverse sensitivity effects. That is the approach taken in this submission where amendments are focused on the proposed objectives and policies.</p>		

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Amendments to the Definitions of the Taupo District Plan Section 10 - OS84.48	<p>Insert a new definition of "reverse sensitivity" (being the definition in the Waikato Regional Policy Statement) as follows:</p> <p>Reverse sensitivity means the <u>potential for the operation of an existing lawfully established activity to be compromised, constrained or curtailed by the more recent establishment of other activities which are sensitive to the adverse environmental effects being generated by the pre-existing activity.</u></p>	<p>Further to Genesis' submission to the definition of Rural Industry, due to the nature of the wider submissions by Genesis, a definition for "Reverse Sensitivity" need to be included in the Taupo District Plan.</p> <p>Amendments to the Definitions of the Taupo District Plan Section 10</p>	Support	Manawa Energy supports this submission.
Amendments to the Definitions of the Taupo District Plan Section 10 - OS84.49	<p>Add definition: <u>Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.</u></p>	<p>Submitter seeks a new definition for Renewable Electricity Generation.</p>	Support	Manawa Energy supports this submission.
Amendments to the Definitions of the Taupo District Plan Section 10 - OS84.50	<p>Add definition: <u>Renewable electricity generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes</u></p>	<p>Submitter seeks a new definition for Renewable Electricity Generation Activities.</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.</u></p>			
Federate Farmers NZ – Colin Guyton				
3b.2 Objectives and Policies - General Rural Environment - OS91.12	<p>(a) the amendment of the objectives for chapter 3b Rural Environment so that they clearly state what is to be achieved, where the objective is to be achieved and when the objective will be achieved; and</p> <p>(b) the amendment of objective 3b.2.6 so that it reads as follows or with wording to similar effect: Objective 3b.2.6 Impacts on essential infrastructure The impacts on <i>essential</i> infrastructure arising from <u>inappropriate subdivision, use and development are managed avoided, remedied or mitigated where it is possible to do so.</u></p>	<p>Federated Farmers has concerns over Objective 3b.2.6 which deals with the impacts on infrastructure from subdivision and development. We recognise that for some essential infrastructure there will be a need to locate in the rural environment. However, the objective also should acknowledge that essential infrastructure can cause reverse sensitivity effects on activities located in the rural environment. Objective 3b.2.4 as currently drafted is inconsistent with Part 2 of the Resource Management Act 1911. It is not appropriate that the objective does not address both sides of the issue or that it seeks to protect</p>	Oppose	Manawa Energy opposes this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	(c) the insertion of a definition for 'essential infrastructure' into the district plan; and (d) any consequential amendments required as a result of the relief sought.	all infrastructure from the effects of all subdivision and development.		
3b.2 Objectives and Policies - General Rural Environment - OS91.13	(a) the amendment of the policies for chapter 3b Rural Environment so that they clearly state how the objective will be met by this policy, where in the region or district will the policy apply, what course of action is to be taken and when, and who is required to comply with the policy and who is to implement the policy; and (b) any consequential amendments required as a result of the relief sought.	Policies need to be written to provide clear direction to decision makers who will be making the decisions on the methods and/or rules used to implement the policies and to address effects. This requires consideration of how will the policy meet the relevant objective, where in the district or region does the policy apply, what action is required to be taken and when (i.e., under what circumstances), who is required to comply with the policy and who will implement the policy. It also needs to be made clearer which objectives some of the policies are related to.	Support	Manawa Energy supports this submission and its intent to seek clarity of policy direction.
Contact Energy – Mark Crisp				
General Rural and Rural Lifestyle Environments - OS93.23	If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and	Contact supports the creation of Rural Lifestyle Zones on the basis that they can provide for rural residential activities in appropriate locations. However, a key aspect of	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>performance standards relating to the Rural Lifestyle Environment to avoid reverse sensitivity effects. That is the approach that has been taken in this submission. If Contact's relief sought in relation to the location of Rural Lifestyle Zones is not accepted, then Contact seeks alternative relief (including additional changes to the rules and performance standards relating to the Rural Lifestyle Environment) which will avoid the creation of reverse sensitivity effects.</p>	<p>Contact's submission is seeking to ensure that Rural Lifestyle Zones are only created in appropriate locations which does not include within or in close proximity to permitted, lawfully existing and/or consented renewable electricity generation activities.</p>		
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS93.24</p>	<p>Amend the definition of Rural Industry as follows: Rural Industry – an activity that directly supports, services, or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, and dairy farming and geothermal/electricity generation.</p> <p>Insert a new definition of Renewable Electricity Generation as</p>	<p>Renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance. Renewable electricity generation is also an activity identified in the Waikato RPS and Bay of Plenty RPS as a Regionally Significant Infrastructure. It is therefore inappropriate to treat that activity as part of, and in the same manner as, other activities that occur in the rural environment such as forestry, agriculture and dairy farming. The elevated status and</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>follows (being the same definition in the NPS-REG):</p> <p>Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.</p>	<p>importance of renewable electricity generation should be recognised in the Taupo District Plan with its own set of objectives, policies and methods.</p>		
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS93.25</p>	<p>Insert a new definition of Renewable electricity generation activities (being the same definition in the NPS-REG) as follows:</p> <p>Renewable electricity generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.</p>	<p>Due to the nature of the following submissions by Contact, additional definitions need to be included in the Taupo District Plan.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>
<p>3b.1 Introduction - OS93.26</p>	<p>Amend the Introduction to Chapter 3b.1 as follows:</p> <p>General Rural Environment</p>	<p>Contact generally supports the introductory statement but seeks minor changes to recognise the</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>...Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy <u>sources</u> and plantation forestry activities, with dispersed buildings and rural roads...</p> <p>The purpose of separating the General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land <u>and other natural resources</u> within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for, yet allowing appropriate development to occur while preserving the <u>rural character</u> openness of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, <u>renewable electricity generation activities</u>, and rural industry, meaning an activity being activities that directly supports, services, or is are dependent on primary production and/or <u>has</u> a locational <u>or functional</u> need to be within the General Rural Environment (rather than an urban environment).</p>	<p>importance and functional need for renewable electricity generation to occur within the Rural Environment, its contribution to the regional economy and New Zealand's security of electricity supply.</p>		

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	<p>Primary production Activities in the General Rural Environment will produce effects that are different from urban areas, such as noise, odour, vibration, spray drift and dust...</p> <p>The General Rural Environment provisions seek to limit the scale of commercial and industrial activities unless they are dependent on primary production and/or have a <u>locational, functional or operational</u> need to be within the General Rural Environment...</p> <p>Rural Lifestyle Environment ... By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property sizes, whilst retaining separation from the rural production <u>and other</u> activities predominating in the General Rural Environment. This separation of activities serves to minimise reverse sensitivity issues. By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space <u>characteristics, rural character and</u> <u>the productive potential</u> of the rest of the Rural Environment, and to</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>reduce the potential for land use conflict.</p> <p>.... The Rural Lifestyle Environment areas are located closer in <u>proximity</u> to urban areas to allow for access to community facilities within the district's townships.</p>			
3b.1 Introduction - OS93.27	<p>Retain Objective 3b.2.1.</p> <p>Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources</p> <p>Primary production <u>and the use of natural resources are</u> is enabled by protecting the availability of the rural land <u>and other</u> resources <u>and its</u> <u>their</u> productive capability.</p>	<p>Contact supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just "primary production". One of the policies which achieves Objective IM-02 is IM-P4 'Regionally Significant Industry and Primary Production'. The suggested amendments give effect to the Waikato RPS.</p>	Support	<p>Manawa Energy supports this submission.</p>
Objective 3b.2.2 Maintaining the established General Rural character - OS93.28	<p>Amend Objective 3b.2.2 to read:</p> <p>Objective 3b.2.2 Maintaining the established General Rural character</p> <p>The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.</p> <p><u>Enable a range of activities in the</u></p>	<p>Contact is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be "maintained". Secondly, an objective that seeks to maintain the "established character" is essentially</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>General Rural Environment that are compatible with rural character.</u>	seeking no change. The objective seeks to <u>avoid</u> "incremental subdivision and development" which essentially locks in the status quo and will make it difficult for any new development to occur, including new development that has been identified in other planning provision as being appropriately located in the General Rural Environment.		
Objective 3b.2.3 Rural industry - OS93.29	Retain Objective 3b.2.3. Inset a new objective following Objective 3b.2.3 as follows: <u>Objective 3b.2.X Renewable Electricity Generation and Transmission Activities</u> <u>Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.</u>	Due to its elevated status under the NPS-REG, Contact has sought (above) that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be including in the Plan. In line with that outcome, a new objective needs to be included in the Plan seeking to enable renewable electricity generation activities (and transmission activities by association).	Support	Manawa Energy supports this submission.
Objective 3b.2.4 Other activities - OS93.30	Amend Objective 3b.2.4 as follows: <u>Objective 3b.2.4 Other activities</u> Maori cultural activities, tourism activities, <u>and</u> visitor accommodation <u>and renewable</u>	As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity generation activities), Objective 3b.2.4 needs to be	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>electricity generation and transmission activities are enabled in <u>appropriate locations within</u> the General Rural Environment.</p>	<p>amended to remove the reference to renewable electricity generation (and transmission by association). Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather than enabled anywhere including in locations whereby reverse sensitivities could arise.</p>		
<p>Objective 3b.2.5 Avoidance of reverse sensitivity - OS93.31</p>	<p>Amend Objective 3b.2.5 as follows: Objective 3b.2.5 Avoidance of reverse sensitivity Reverse sensitivity effects on permitted, and legally established, <u>and/or consented</u> activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.</p>	<p>Contact supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Contact is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already <i>exists</i>. This is particularly concerning for Contact. The objective needs to also cover consented activities which have yet to be constructed / undertaken. Contact's geothermal generation activities, which do and are anticipated to occur in the District's General Rural Environment (as identified in the introductory text to this chapter and Strategic Directions chapter).</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.2.6 Impacts on infrastructure - OS93.32	Amend Objective 3b.2.6 as follows: Objective 3b.2.6 Impacts on infrastructure The impacts on infrastructure arising from subdivision and development are managed, do not compromise the safe and efficient functioning of infrastructure.	An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan.	Support	Manawa Energy supports this submission.
Policy 3b.2.9 Maintaining the established character - OS93.33	Amend Policy 3b.2.9 as follows: Policy 3b.2.9 Maintaining the established Rural character Enable activities in the Maintain the established General Rural Environment that will not compromise the character of the General Rural Environment, as defined by: a) <u>Extensive pastoral farming and forestry</u> b) <u>Renewable electricity generation activities</u> c) <u>Geothermal areas and activities, electricity transmission and distribution</u> ad) ... e) Noises related to production activities during the day but low levels of noise at night d) Low levels of light spill	Contact is of the view that Policy 3b.2.9 is misguided and seeks to achieve the wrong outcome. The policy characterises the rural environment by matters such as "limited signage" whereas the existence of more than 20 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupo District.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>f) <u>Effects from activities including noise, vibration, dust, odour and visual effects</u></p> <p>e) Infrequent vehicle movements to and from a site</p> <p>fg)...</p>			
<p>Policy 3b.2.10 Residential units - OS93.34</p>	<p>Amend Policy 3b.2.10 as follows: Policy 3b.2.10 Residential units Avoid the cumulative effects of rural lifestyle development by <u>providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment</u> that:</p> <p>a) ...</p> <p>c) Erode the general rural character through its density, scale and location-</p> <p>d) <u>Result in the potential to generate reverse sensitivity effects.</u></p> <p>e) <u>Constrain the ability to access or utilise renewable energy resources.</u></p>	<p>Contact supports Policy 3b.2.10 but it needs to be expanding to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>
<p>Policy 3b.2.12 Minor residential unit - OS93.35</p>	<p>Amend Policy 3b.2.12 as follows: Policy 3b.2.12 Minor residential unit Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the</p>	<p>It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment. A minor residential unit is a sensitive activity,</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised <u>and to avoid the potential for reverse sensitivity effects.</u>	and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.		
Policy 3b.2.13 Avoiding reverse sensitivity - OS93.36	Amend Policy 3b.2.13 as follows: Policy 3b.2.13 Avoiding reverse sensitivity Any adverse effects generated by an <u>new sensitive activity</u> must be managed within the allotment so as to avoid adversely affecting reverse sensitivity effects on permitted, and lawfully established <u>and/or consented</u> neighbouring activities.	Contact supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. Contact seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.	Support	Manawa Energy supports this submission.
Policy 3b.2.14 Commercial and industrial activity - OS93.37	Amend Policy 3b.2.14 as follows: Policy 3b.2.14 Commercial and industrial activity Limit the scale of commercial and industrial activity (<u>excluding renewable electricity generation activities</u>) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production <u>and other</u> activities	Because renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities. Contact supports the intent of the policy but it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>provided for</u> within the General Rural Environment.	General Rural Environment beyond just primary production.		
Policy 3b.2.15 Allotment size - OS93.38	Retain Policy 3b.2.15.	Contact supports Policy 3b.2.15 on the basis that it reinforces the intension that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities).	Support	Manawa Energy supports this submission.
Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment - OS93.39	Delete Objective 3b.3.1 and replace it with the following: Objective 3b.3.1 Enable Rural Residential Activities <u>Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.</u>	This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments).	Support	Manawa Energy supports this submission.
Objective 3b.3.2 Avoid reverse	Amend Objective 3b.3.2 as follows: Objective 3b.3.2 Avoid reverse sensitivity Adverse reverse sensitivity effects;	Contact supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Contact is		

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
sensitivity - OS93.40	including conflict with on permitted, and legally established and/or consented activities in neighbouring Environments, are avoided.	concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already <i>exists</i> . This is particularly concerning for Contact. The objective needs to also cover consented activities which have yet to be constructed / undertaken.		
Objective 3b.3.3 Commercial and industrial activities - OS93.41	Amend Objective 3b.3.3 as follows: Objective 3b.3.3 Commercial and industrial activities The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the <u>Rural Lifestyle Environment</u> are avoided.	Contact supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity.	Support	Manawa Energy supports this submission.
Objective 3b.3.4 Consolidate rural lifestyle activities - OS93.42	Retain Objective 3b.3.4.	Contact supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.	Support	Manawa Energy supports this submission.
Objective 3b.3.6 Impacts on community	Amend Objective 3b.3.6 as follows: Objective 3b.2.6 Impacts on community infrastructure The impacts on community	An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
infrastructure - OS93.43	infrastructure arising from subdivision and development are managed <u>do not compromise the safe and efficient functioning of infrastructure.</u>	management decision makers or other users of the Taupo District Plan. The objective should apply to all infrastructure, not just community infrastructure.		
Policy 3b.3.9 Character of the Rural Lifestyle Environment - OS93.44	Add a new point i) to Policy 3b.3.9 as follows: i) <u>An environment that is surrounded by a working rural environment including rural production, geothermal areas and renewable electricity generation activities.</u>	Contact supports Policy 3b.3.9 but it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.		
Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment - OS93.45	Retain Policy 3b.3.10.	Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing reverse sensitivity effects. Contact therefore supports this policy on this basis.	Support	Manawa Energy supports this submission.
Policy 3b.3.12 Minor residential unit - OS93.46	Amend Policy 3b.3.12 as follows: Policy 3b.3.12 Minor residential unit Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and	A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment. It is important that the location of minor residential units is	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	to further protect the character of the #Rural Lifestyle Environment: <u>and to avoid reverse sensitivity effects.</u>	managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.		
4b.1.1 Activities in the General Rural Environment - OS93.47	Retain Rule 4b.1.1.	Contact supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.	Support	Manawa Energy supports this submission.
4b.1.2 Minor residential units - OS93.48	Amend Rule 4b.1.2 as follows: i.... f. The ability to mitigate <u>avoid</u> adverse effects, <u>including reverse sensitivity effects</u> , through the use of screening, planting, landscaping, and <u>alternative design, and/or other means including restrictive covenants.</u> ... i. <u>The potential to constrain access to and/or the utilisation of renewable energy sources.</u>	Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects. An additional criterion has been added to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.	Support	Manawa Energy supports this submission.
4b.1.3 Temporary Activities - OS93.49	Retain Rule 4b.1.3.	Contact supports this rule.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields - OS93.50	<p>Amend Rule 4b.1.4 as follows:</p> <p>4b.1.4 Electricity Generation Core Sites, Renewable Electricity Energy Generation Activities and Geothermal Areas Steamfields</p> <p>i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal <u>areas steamfields</u>, renewable <u>energy electricity</u> generation activities and associated structures <u>and ancillary activities</u> is a permitted activity.</p> <p>ii. <u>Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.</u></p> <p>NOTE: For the purpose of this rule "maintenance" means: All activities associated with the protective care, and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation <u>of all associated structures and</u></p>	<p>Contact supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for the operation, maintenance and minor upgrading renewable electricity generation activities in the General Rural Environment. The term "Geothermal Areas" has been used rather than "Geothermal Steamfields" due to Section O of the Plan identifying and mapping Geothermal Areas. A second clause has been added to the rule on the basis of Policy G of NPS-REG.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>includes maintenance of surrounds and water areas.</p> <p>NOTE: For the purpose of this rule "minor upgrading" means: Structural improvement, repair and replacement <u>or upgrade of components, or activities required for the continued safe and efficient operation</u> including worn or technically deficient parts of <u>any structure including</u> the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures of similar character and scale, and includes associated drilling, <u>vehicles, infrastructure, machinery</u>, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures up to 100m² in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	with the Noise Performance Standard.			
4b.1.5 Commercial and industrial activities, and home businesses, - OS93.51	Amend Rule 4b.1.5 as follows: ... When considering activities under Rule 4b.1.5ii Council restricts the exercise of its discretion to the following matters: ... c. The effect of the activity on surrounding land uses (<u>including reverse sensitivity effects</u>) and how these effects can be managed onsite and/or mitigated...	The third paragraph should refer to Rule 4b.1.5ii. Home businesses could include sensitive activities and need to avoid creating reverse sensitivity effects.	Support	Manawa Energy supports this submission.
4b.1.7 High voltage transmission lines - OS93.52	Amend Rule 4b.1.7 as follows: 4b.1.7 Buildings and Structures in proximity to High voltage transmission lines i. Any building <u>or structure</u> (except network utilities and <u>Renewable Electricity Generation Activities</u>) located within 0 – 12 meters of a high-voltage transmission line is a restricted discretionary activity .	Contact supports this rule as it seeks to ensure the safe operation of transmission lines. However, the heading of the rule needs to be more accurate. In addition to network utilities, this rule should also provide an exception for renewable electricity generation activities (which are not necessarily network utilities).	Support	Manawa Energy supports this submission.
4b.1.8 Buildings within Outstanding Landscape Areas - OS93.53	Retain Rule 4b.1.8 but amend the first exception to the rule as follows: EXCEPTION: This rule will not apply to the erection of structures:	Contact supports this rule on the basis that it does not apply to buildings within Electricity Generation Core Sites, but there is no reason why it should not apply to all other	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	a. <u>Associated with existing renewable electricity generation activities including Wwithin Electricity Generation Core Sites.</u> b. ...	existing renewable electricity generation activities.		
4b.1.9 Earthworks within Outstanding Landscape Areas - OS93.54	Retain 4b.1.9 but amend the exception as follows: EXCEPTION: This rule will not apply to Earthworks <u>associated with existing and/or consented renewable electricity generation activities including</u> within Electricity Generation Core Sites.	Contact supports this rule on the basis that it does not apply to earthworks within Electricity Generation Core Sites, but there is no reason why it should not apply to all other existing renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.1 Vehicle movements - OS93.55	Retain 4b.2.1 but amend the exception as follows: EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and consented renewable electricity generation activities.</u>	Contact supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.5 Maximum building height - OS93.56	Amend Rule 4b.2.5 as follows: 4b.2.5 Maximum building height ... iv. 15 meters for <u>renewable Electricity Generation activities</u>	Contact seeks amendments to Rule 4b.2.5 to make the rule applicable to all renewable electricity generation activities within Geothermal Areas. An additional exception has	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>on land identified as a Geothermal Area in Section O within an Electricity Generation Core Site.</p> <p>EXCEPTIONS:</p> <ul style="list-style-type: none"> · <u>activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators including wind monitoring masts – no height limit</u> · ... · Drilling Rigs for up to 60 days per well allotment – no height limit. 	<p>been added to the rule on the basis that Policy G of NPS-REG</p>		
<p>4b.2.6 Minimum building setbacks - OS93.57</p>	<p>Amend Rule 4b.2.6 as follows:</p> <p>4b.2.6 Minimum building setbacks</p> <p>i....</p> <p>v. There shall be no front boundary setback for buildings and activities associated with Electricity Generation and Renewable Energy <u>Electricity Generation Activities</u> on land identified as Geothermal Area in Section O within an Electricity Generation Core Site where the road extends over any power generation Building or Structure.</p> <p>vi. There shall be no boundary</p>	<p>Contact seeks minor amendments to Rule 4b.2.6 to make it more accurate and workable.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	setback for buildings and activities associated with <u>Renewable Electricity Generation Activities</u> on land identified as Geothermal Area in Section O <u>including</u> within an Electricity Generation Core Site...			
4b.2.7 Minor residential units - OS93.58	Amend Rule 4b.2.7 as follows: 4b.2.7 Minor residential units ... i. All minor residential <u>units</u> or accommodation activity units shall: a. ... c. <u>Be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more that 300m away from any aforementioned Consent Area....</u>	Minor residential units need to be located so that they do not create additional restrictions on renewable electricity generation activities by, for example, moving a point of noise compliance closer to the source of noise.	Support	Manawa Energy supports this submission.
4b.2.8 Commercial and industrial activities, and home businesses - OS93.59	Amend Rule 4b.2.8 as follows: 4b.2.8 Commercial and industrial activities, and home businesses i. ... iii. <u>Home businesses shall be</u>	Home businesses need to be located so that they do not create additional restrictions on renewable electricity generation activities.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more that 300m away from any aforementioned Consent Area...</u></p>			
4b.2.9 Maximum Noise – Limits - OS93.60	Retain	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.2.10 Maximum Noise - Construction Noise - OS93.61	Retain	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.2.11 Maximum Noise - Electricity Generation Core Sites - OS93.62	Retain	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.2.12 Maximum Noise - Well Drilling and Testing - OS93.63	Retain	Contact supports this rule.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.2.13 Maximum Noise – Other - OS93.64	Amend Rule 4b.2.13 as follows: 4b.2.13 Maximum Noise – Other ... ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, <u>bursting discs, emergency or upset operating conditions</u> and hydro spills associated with the operation of <u>Renewable Electricity Generation Activities Core sites</u> . Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.	Contact supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.	Support	Manawa Energy supports this submission.
4b.2.14 Parking, Loading and Access - OS93.65	Delete Rule 4b.2.14.	Taupo District is a Tier 3 territorial authority. The NPS-UD sets out that tier 1, 2 and 3 territorial authorities must remove district plan rules, assessment criteria, policies and objectives that have the effect of setting minimum car parking rates as soon as practicable, no more than 18 months from the date of commencement of the NPS-UD.	Support	Manawa Energy supports this submission.
4b.2.15 Signage - OS93.66	Retain Rule 4b.2.15.	Contact supports this rule.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.5.1 Subdivision - General Rural Environment - OS93.67	Retain Rule 4b.5.1 subject to an additional matter of control as set out in Rule 4b.5.3.	Contact supports this rule subject to an additional matter of control as set out in Rule 4b.5.3.	Support	Manawa Energy supports this submission.
4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment - OS93.68	Contact supports this rule subject to an additional matter of control as set out in Rule 4b.5.3.	Retain Rule 4b.5.2 subject to an additional matter of control as set out in Rule 4b.5.3.	Support	Manawa Energy supports this submission.
4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment - OS93.69	Amend Rule 4b.5.3 as follows: ...For the purposes of Rules 4b.5.1.i, 4b.5.2.i and 4b.5.3.i the matters over which the Council reserves control for the purpose of assessment are: ... i) <u>Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.</u>	Contact supports this rule with the inclusion of an additional matter over which control is reserved for controlled activities.	Support	Manawa Energy supports this submission.
4b.5.4 Subdivision - Default Activity Status - OS93.70	Retain Rule 4b.5.4.	Contact supports this rule.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.5.5 Subdivision resulting in a new public road, or extension of existing public road - OS93.71	Retain Rule 4b.5.5.	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.5.6 Subdivision – Other - OS93.72	Retain Rule 4b.5.6	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.5.7 Subdivision - Outstanding Landscape Areas – Other - OS93.73	Retain Rule 4b.5.7.	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.5.8 Subdivision - Bonus Lots - OS93.74	Retain Rule 4b.5.8.	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.5.9 Subdivision - More than 12 allotments - OS93.75	Retain Rule 4b.5.9.	Contact supports this rule.	Support	Manawa Energy supports this submission.
Planning Maps - OS93.76	Delete the proposed Rural Lifestyle Environment on Centennial Drive and retain the current Rural Environment (General Rural Environment). View full submission bundle for map.	Contact opposes the rezoning of land on Centennial Drive to Rural Lifestyle Environment. Existing land use character is a relevant factor when determining land use zoning, but it is not necessarily determinative of the outcome. There are a range other factors that need to be taken into	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		<p>account. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment. The Centennial Drive area is vitally important for enabling large scale industrial activities, noisy recreationally activities, and the utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes (the latter being a matter of national significance as recognised in the NPS for Renewable Electricity Generation). This area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities.</p>		
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS93.78</p>	<p>Insert a new definition of reverse sensitivity (being the definition in the Waikato RPS) as follows: Reverse sensitivity is the <u>vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived</u></p>	<p>Due to the nature of the following submissions by Contact, two additional definitions need to be included in the Taupo District Plan.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.</u></p>			
Planning Maps - OS93.79	Delete the parts of the proposed Rural Lifestyle Environment at 146, 122, 104 Oruanui Road, and retain the current Rural Environment (General Rural Environment).	Contact opposes the rezoning of parts of the land on Oruanui Road to Rural Lifestyle Environment. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment to the south which includes Te Mihi Power Station and associated steamfield activities. Additional wells are planning to be drilled in the area to the north of Te Mihi Power Station in accordance with resource consents held by Contact.	Support	Manawa Energy supports this submission.
Planning Maps - OS93.80	Delete the part of the proposed Rural Lifestyle Environment at 2 Caroline Drive, which extends along SH5. View full submission for map.	Contact opposes the rezoning of part of the land on Napier Road (known as Bonshaw Park) to Rural Lifestyle Environment. Specifically, Contact opposes the additional 'leg' of land extending to the west of Bonshaw	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		Park along the Napier Road frontage. Contact recognised the 'sensitive' nature of Bonshaw Park as part of consenting the Tauhara Geothermal Development. The outcome includes a 100m setback from Bonshaw Park for surface activities undertaken by Contact.		
Planning Maps - OS93.81	Delete the parts of the proposed Rural Lifestyle Environment at 21, 41, 61, 194 and 196 and Tukairangi Road and 437 Poihipi Road and retain the current Rural Environment (General Rural Environment).	Contact opposes the rezoning of part of the land on Tukairangi Road to Rural Lifestyle Environment. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment to the north and east which includes Poihipi Power Station and associated steamfield activities.	Support	Manawa Energy supports this submission.
LWAG – Jane Penton				
4b Rural Environment - OS101.7	LWAG request consideration be given to natural gully systems in the General Rural Environment and proposed Rural Lifestyle Zone including general protection, restricted land use in	LWAG request consideration be given to natural gully systems in the General Rural Environment and proposed Rural Lifestyle Zone including general protection, restricted land use in	Oppose	Manawa Energy opposes this submission, as provision needs to be made for infrastructure and activities that have a functional requirement to be located in these areas.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	close proximity to , restricted or controlled access, vegetation enhancement and management, erosion control.	close proximity to , restricted or controlled access, vegetation enhancement and management, erosion control.		
4b Rural Environment - OS101.8	LWAG request consideration be given to natural gully systems in the General Rural Environment and proposed Rural Lifestyle Zone including provisions for general protection, restricted land use in close proximity to , restricted or controlled access, vegetation enhancement and management, erosion control. LWAG ask that the provisions ensure that the N restrictions apply to land use in the rural lifestyle zone.	LWAG agrees with WRC 's previous comments to the Draft DP that 'development should be situated away from natural gully systems and that gully vegetation should be managed to avoid exacerbating actual or potential erosion (and related) risks. Identification and protection of natural gullies should be mandatory for all development in the district. '	Oppose	Manawa Energy opposes this submission, as provision needs to be made for infrastructure and activities that have a functional requirement to be located in these areas.
Edison Consulting Group – Time Lester				
Objective 3b.2.4 Other activities - OS106.15	The submitter seeks the following amendment to Proposed Objective 3b.2.4: <i>Maori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission (including sub</i>	The submitter consider it appropriate to include a reference to sub transmission activities so as to avoid confusion with the electricity transmission function of Transpowers National Grid network. The sub transmission network includes high-voltage lines of 11kV and 33kV, which	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<i>transmission) activities are enabled in the General Rural Environment.</i>	are common features within the Rural Environment.		
Policy 3b.2.13 Avoiding reverse sensitivity - OS106.17	The submitter seeks that Policy 3b.2.13 is retained as current drafted "Any adverse effects generated by an activity must be managed within the allotment so as to avoid adversely affecting permitted and lawfully established neighbouring activities."	The submitter supports this policy in relation to the safe and efficient operation of the distribution network located with the district's rural environment. Examples of activities that could have an adverse effect could relate to earthworks, and the potential effects such soil disturbance could have on support structures or in relation to maintaining clearance to lines through site contouring.	Support	Manawa Energy supports this submission.
Objective 3b.3.2 Avoid reverse sensitivity - OS106.18	The submitter seeks that Objective 3b.3.2 is retained as current drafted.	The submitter support the protection for rurally located electricity distribution network from the adverse effects of reverse sensitivity. Supportive of the word "avoided" as it sends a strong message of the need to manage reverse sensitivity effects.	Support	Manawa Energy supports this submission.
Transpower NZ – Trudi Burney				
Amendments to the Definitions of the Taupo District Plan Section 10 -	Add the following definition: NATIONAL GRID has <u>the same meaning as provided in</u>	Transpower requests the inclusion of a definition for the National Grid, to support amendments requested by	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
OS110.1	<u>the National Policy Statement on Electricity Transmission 2008.</u>	Transpower that incorporate this term into the strategic directions.		
Amendments to the Definitions of the Taupo District Plan Section 10 - OS110.2	Add new definition for 'regionally significant infrastructure' and include the 'National Grid' within this definition.	These terms are used in the Strategic Directions chapter but are not defined in Plan Change 38 nor in the operative District Plan. The introductory text in 2.5 Strategic Direction 5 refers to various types of infrastructure but does not clearly delineate between regionally significant and nationally significant infrastructure, nor whether any infrastructure is classified as neither of these. Definitions are required so that the intention and application of the strategic direction objectives are clear.	Support	Manawa Energy supports this submission.
3b Rural Environment Chapter - OS110.13	Delete references to the National Grid from the Rural Environment chapter and introduce a new district-wide Infrastructure/Network Utilities chapter.	Transpower seeks the introduction of a specific framework that manages effects of and on the National Grid, and gives effect to the NPSET. Transpower requests that new district-wide provisions are introduced, and provides suggested objectives, policies and rules in Appendix A to this submission. If Council chooses not to introduce the framework in Appendix A district-wide, Transpower seeks amendments	Support	Manawa Energy supports this submission, the Council should be providing for all NPS documents and implementing the National Planning Standards.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		to the Rural Environment chapter as outlined in following submission points.		
3b.1 Introduction - OS110.14	Amend introduction as follows: <i>Other activities that are anticipated in the Rural Environment are tourism activities, visitor accommodation and renewable electricity generation and transmission. It is important that all such activities do not affect the ability of the rural environment to function effectively, <u>recognising that some activities have specific locational or operational needs that must be accommodated...</u></i>	Transpower requests amendments to the introductory text to reflect that electricity transmission activities should not be constrained by the function of the rural environment, and that the National Grid has functional or operational need to be in particular locations. While it is unlikely that the presence of National Grid infrastructure would create constraints on rural function, these amendments would ensure consistency with the direction of the NPSET.	Support	Manawa Energy supports this submission.
Radio NZ – Annabelle Lee – Chapman Trip				
4b.2.9 Maximum Noise – Limits - OS112.9	The following wording is suggested for an exemption: <i><u>x. The use of generators and mobile equipment (including vehicles) for emergency purposes, including testing and maintenance not exceeding 48 hours in duration, where they are operated by</u></i>	RNZ seeks an exemption from noise rules for the use of generators for emergency purposes by lifeline utilities. On the rare occasions the portable generator at RNZ's Facilities is used during scheduled or extensive power outages, it makes a certain amount of noise. As a lifeline utility it is critical RNZ can continue to use to	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>emergency services or lifeline utilities;</u>	ensure uninterrupted operations during emergencies.		
Taupo Climate Change Action Group – Alana Delich				
4b Rural Environment - OS114.13	The submitter request consideration be given to natural gully systems in the General Rural Environment and proposed Rural Lifestyle Zone including general protection, restricted land use in close proximity to, restricted or controlled access, vegetation enhancement and management, erosion control.	The submitter considers that identification and protection of natural gullies in the General Rural and Proposed Rural Lifestyle should be mandatory for all development in the district.	Oppose	Manawa Energy opposes this submission, as provision needs to be made for infrasture and activities that have a functional requirement to be located in these areas.



First name: Mark

Last name: Crisp

On behalf of:
Contact Energy Limited

Postal address: C/- Mitchel Daysh Limited

Suburb:

City: Hamilton

Country: New Zealand

Email: mark.chrisp@mitchelldaysh.co.nz

Daytime Phone: 027 4758383

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

If others make a similar further submission, Contact would consider presenting a joint case with them at any hearing.

Attached Documents

File

PDF - FS Contact Energy



Contact Energy Limited
Further Submissions on Plan Change 38
to the Taupō District Plan
Strategic Directions

Date: 6 April 2023

To: Taupō District Council

Submitter: Contact Energy Limited

Submitter No.: 93

Address for service: C/- Mitchel Daysh Limited
PO Box 1307
HAMILTON 3240
Attention: Mark Chrisp

Contact details: **E** mark.chrisp@mitchelldaysh.co.nz
M +64 27 475 8383

- In accordance with clause 8(1) of the First Schedule of the Resource Management Act Contact Energy Limited represents a relevant aspect of the public interest.
- Contact Energy Ltd (Contact) wishes to be heard in support of this further submission.
- If others make a similar further submission, Contact would consider presenting a joint case with them at any hearing.

Contact Energy Limited by its duly authorised agent:

Mitchell Daysh Limited

Mark Chrisp

Further Submissions to TDC on behalf of Contact Energy Limited

Plan Change 38 (Strategic Directions)

Submission Point	Name of Submitter	Support or Oppose	Reason	Decision Sought from Council
Individual Submitters				
OS3.2	Jen Shieff Turangi Riverside Area Preservation Group	Support in part	The submitter seeks to retain Strategic Direction 2.3.3 point 10. Contact Energy sought amendments to Policy 2.3.3.10 in their original submission.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.
OS3.4	Jen Shieff Turangi Riverside Area Preservation Group	Support in part	The submitter seeks to retain Strategic Direction 2.6.2. Objectives Contact Energy sought amendments to the 2.6.2 Objectives in their original submission.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.
OS3.5	Jen Shieff Turangi Riverside Area Preservation Group	Oppose	The submitter seeks to amend the policies in Strategic Direction 2.3.3.8, to make reference to all town centres in the district. Contact Energy sought to retain 2.3.3.8 as notified in their original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS9.1	Lucy Edwards NZ Defence Force	Oppose in part	The submitter seeks to retain the objectives 2.5.2 as notified. Contact Energy sought to amend Objectives 2.5.2.1 and 2.5.2.2 in their original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.

OS9.2	Lucy Edwards NZ Defence Force	Oppose in part	The submitter seeks to retain the policy 2.5.3 as notified. Contact Energy sought to amend Policies 2.5.3.1 and 2.5.3.2 in their original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS17.3	Jennifer Molloy- Hargreaves	Oppose	The submitter is fully supportive of Plan Change 38. Contact Energy sought several amendments to Plan Change 38 in their original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS41.11	John Lenihan Rangitira Block Trusts	Oppose	The submitter is seeking to delete Policy 2.3.3. They regard it as a poorly drafted policy. Contact Energy sought several amendments to Policy 2.3.3 in their original submission. The deletion of Policy 2.3.3 is therefore inconsistent with the relief sought by Contact Energy.	Reject the relief sought by the submitter.
OS91.5	Colin Guyton Federated Farmers of NZ	Oppose	The submitter is seeking amendments to 2.4 Strategic Direction 4 Climate Change – Policy 2. The amendments sought are not entirely consistent with the amendments proposed in the original Contact Energy submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.

OS91.6	Colin Guyton Federated Farmers of NZ	Oppose	<p>The submitter is seeking amendment to 2.5 Strategic Direction 5 Significant and Local Infrastructure.</p> <p>Federated Farmers supports strategic direction 5 as it is currently drafted including the objectives and policies. However, they seek an amendment to the policies so that it is acknowledged that infrastructure can (and does) have reverse sensitivity effects on existing land use activities such as farming and primary production.</p> <p>Federated Farmers are seeking an addition to Policy 2.5.3 of a new clause to read as below or with wording to similar effect;</p> <p><u>6. To recognise the reverse sensitivity effects infrastructure may have on existing land use activities and to avoid, remedy or mitigate these effects where possible.</u></p> <p>and</p> <p>any consequential amendments required as a result of the relief sought.</p>	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS62.2	Alana Delich Singers Ecological	Oppose	<p>The submitter is seeking amendments to provide for an indigenous buffer between geothermal ecosystems and industrial development. The submission relates to the proposed Industrial rezoning at Broadlands Road (and therefore appears to be a submission to <u>Plan Change 43 not Plan Change 38</u>).</p> <p>The principle of creating a buffer on industrial zoned land (and potentially rendering areas of industrial land unsuitable for development) is opposed; particularly in the absence of appropriate information and detail to understand the location and scale of the proposed buffer</p>	Reject the relief sought by the submitter

OS62.6	Alana Delich Singers Ecological	Oppose	<p>The submitter is seeking amendments to Policy 2.2.3 to provide a buffer between industrial activity and indigenous areas. The submission relates to the proposed Industrial rezoning at Broadlands Road (and is therefore a submission to Plan Change 43 <i>not Plan Change 38</i>).</p> <p>The principle of creating a buffer on industrial zoned land (and potentially rendering areas of industrial land unsuitable for development) is opposed, particularly in the absence of appropriate information and detail to understand the location and scale of the proposed buffer</p>	Reject the relief sought by the submitter.
OS114.6	Alana Delich Taupō Climate Action Group	Support in part	<p>The submitter is seeking amendments to 2.6 Strategic Direction 6 Natural Environment Values to include 'specific recognition of significant geothermal features in the preamble to the strategic direction'.</p> <p>The addition of reference to significant geothermal features in the preamble is supported insofar as it acknowledges the significant geothermal features located within the District, and the outcome is consistent with the Waikato Regional Plan and the original submission by Contact Energy.</p>	Accept the relief sought by the submitter only insofar as the outcome is consistent with the Waikato Regional Plan and the original submission by Contact Energy.
OS114.7	Alana Delich Taupō Climate Action Group	Oppose	<p>The submitter is seeking the addition of a new objective to recognise the significant geothermal features within the district within the Natural Environment Values. The following new objective is proposed: <i>"The protection of significant geothermal features from inappropriate land use and development which may adversely affect these unique ecosystems."</i></p>	Reject the relief sought by the submitter insofar as the outcome is inconsistent with the Regional Policy Statement and Waikato Regional Plan management regime relating to Significant Geothermal Features; and the original submission by Contact Energy.

OS114.18	Alana Delich Taupō Climate Action Group	Support in part	<p>The submitter is seeking amendments to the wording in the climate change strategic direction to be consistent with new legislation, including the NPSUD and Natural and Built Environment Bill which have stronger statements including, supporting reduction in greenhouse gas emissions and are resilient to current and future effects of climate change and the reduction in risks arising from, and better resilience.</p> <p>Amendments to support a reduction in greenhouse gas emissions are supported insofar as any amendments recognise the significance of renewable electricity generation within the District, and is consistent with the original submission by Contact Energy.</p>	Accept the relief sought insofar as it recognises the role of renewable electricity generation within the District and is consistent with the original submission by Contact Energy.
OS110.3	Trudi Burney Transpower NZ Ltd	Support in part	<p>The submitter is seeking amendments to the 2.5 Strategic Directions 5 Significant and Local Infrastructure including the addition of definitions for 'nationally significant; and 'regionally significant' infrastructure. The addition of definitions is supported by Contact Energy.</p>	Accept the relief sought by the submitter insofar as definitions for 'nationally significant' and regional significant' infrastructure are included within the District Plan, provided these definitions include the existing power station sites, associated infrastructure and ancillary activities.
OS110.6	Trudi Burney Transpower NZ Ltd	Support in part	<p>The submitter is seeking amendments to the District Plan to include definitions for 'nationally significant' and regional significant' infrastructure as referred to in 2.5.3 Strategic Directions Policy 2.</p>	Accept the relief sought by the submitter. Add appropriate definitions for 'nationally significant' and regional significant' infrastructure provided these definitions include the existing power station sites, associated infrastructure and ancillary activities.

OS110.7	Trudi Burney Transpower NZ Ltd	Oppose	<p>The submitter is seeking to amend Strategic Directions 2.5.3 Policy 3 to delete the reference to reverse sensitivity effects.</p> <p>The original submission by Contact Energy sought to retain the existing wording in Policy 3.</p>	<p>Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.</p>
OS112.1	Annabelle Lee Chapman Tripp Radio NZ Ltd	Support	<p>The submitter is seeking amendments to the 2.5 Strategic Directions 5 Significant and Local Infrastructure; including the addition of definitions for 'nationally significant' and regional significant' infrastructure.</p> <p>The addition of appropriate definitions is supported by Contact Energy.</p>	<p>Accept the relief sought by the submitter. Add appropriate definitions for 'nationally significant' and regional significant' infrastructure provided these definitions include the existing power station sites, associated infrastructure and ancillary activities.</p>
OS59.9	Andrea Curcio Lamas Ryman Healthcare Ltd	Support in part	<p>The submitter is seeking amendments to the Strategic Directions in 2.3.3 Policy 10. The amendments proposed are potentially inconsistent with the relief sought in the original submission by Contact Energy (which also sought amendments to the wording of Policy 10).</p> <p>The amendments sought are supported insofar as they are consistent with the relief sought in the original submission by Contact Energy.</p>	<p>Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.</p>

OS98.9	Andrea Curcio Lamas Retirement Village Association of NZ Inc	Support in part	The submitter is seeking amendments to the Strategic Directions in 2.3.3 Policy 10. The amendments proposed are potentially inconsistent with the relief sought in the original submission by Contact Energy (which also sought amendments to the wording of Policy 10). The amendments sought are supported insofar as they are consistent with the relief sought in the original submission by Contact Energy.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.
OS46.9	Chris Marshall Tukairangi Trust	Oppose	The submitter is seeking amendments to Policy 2.4.3 relating to avoiding subdivision and land use adjacent to natural areas. Contact Energy have also sought amendments to Policy 2.4.3. The submission is therefore opposed insofar as it is inconsistent with the relief sought in the original submission by Contact Energy.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS115.11	George Asher Te Kotahitanga o Ngati Tuwharetoa	Support in part	The submitter is seeking amendments to Strategic Directions 2.5.2 Objectives. The amendments proposed are supported insofar as they are consistent with the relief sought in the original submission by Contact Energy.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.
OS115.33	George Asher Te Kotahitanga o Ngati Tuwharetoa	Support in part	The submitter is seeking amendments to Strategic Directions 2.5.3 Policy 1. The amendments proposed are supported insofar as they are consistent with the relief sought in the original submission by Contact Energy.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.

OS115.34	George Asher Te Kotahitanga o Ngati Tuwaharetoa	Oppose	The submitter is seeking amendments to Strategic Directions 2.5.3 to delete Policies 3 and 4, and replace with a new policy. The amendments proposed are opposed insofar as they are inconsistent with the relief sought in the original submission by Contact Energy.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
Submitter No. 89 Department of Conservation				
OS89.1	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking amendments to Plan Change 38 to give effect to the national direction under the DNPS-IB. The submitter seeks that the Strategic Directions chapter be updated to give effect to the NPS-IB where required. This is beyond the scope of the Plan Change.	Reject the relief sought by the submitter.
OS89.2	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking amendments to Plan Change 38 to include an objective and/or policy in relation to biodiversity offsetting and biodiversity compensation to have better regard to section 6(c) of the RMA. This is beyond the scope of the Plan Change.	Reject the relief sought by the submitter.
OS89.5	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking amendments to Objective 2.3.2.7	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS89.6	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking to retain 2.3.3 Policy 7 as notified, unless iwi/hapu/whanau request specific changes. Contact Energy have also sought changes to this Policy in the original submission	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.

OS89.7	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking to amend 2.3.3. Policy 12 to replace 'do not support' with avoid. The use of 'avoid' is opposed by Contact Energy.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS89.11	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking to retain 2.6.2 Objective 4 as notified, unless iwi/hapu/whanau request specific changes. Contact Energy have also sought changes to this Policy in the original submission	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS89.15	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking to amend 2.6.3 Policy 1 to allow for consideration of adverse effects that could occur on SNAs from 'subdivision'. Contact Energy has also sought changes to this Policy in the original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
Submitter No.22 NZ Pork Industry Board				
OS22.20	Hannah Ritchie NZ Pork Industry Board	Support in part	The submitter is seeking amendments to Objective 2.4.2 to relate back to land use activities that produce greenhouse gas emissions. Contact Energy also sought amendments to this objective in their original submission.	Accept the relief sought by the submitter insofar as any amendments are consistent with the relief sought in the original submission by Contact Energy.
OS22.21	Hannah Ritchie NZ Pork Industry Board	Oppose in part	The submitter is seeking to retain 2.4 Strategic Direction 4 Climate Change. Contact Energy have sought a number of amendments to 2.4. Strategic Direction 4 Climate Change in their original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.

OS22.22	Hannah Ritchie NZ Pork Industry Board	Oppose	<p>The submitter is seeking to amend Policy 2.4.3 Strategic Direction to include a new strategic direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the district.</p> <p>The amendments seek to manage reverse sensitivity effects with respect to primary production activities. The proposed wording does not consider the effects on other lawfully established activities (including Geothermal Power Stations, Taupō Motorsport Park and Taupō Racing Club) that are also located within the Rural Environment.</p> <p>Contact Energy also sought amendments to the Policies in 2.4.3 in their original submission.</p>	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS22.23	Hannah Ritchie NZ Pork Industry Board	Oppose	<p>The submitter is seeking to amend Chapter 2 Strategic Directions to include a new strategic direction, objectives and policies to outline key strategic and significant resource management issues for the rural environments within the district.</p> <p>The proposed amendments do not recognise other lawfully established activities (including Geothermal Power Stations, Taupō Motorsport Park and Taupō Racing Club) that are also located within the Rural Environment.</p>	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
Submitter No. 26 Horticulture NZ				
OS26.59	Sarah Cameron Horticulture NZ	Support in part	The submitter is seeking to amend Chapter 2 Strategic Directions to include a new strategic direction for the Rural Environment.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.

Submitter No. 29 Waikato Regional Council				
OS29.3	Joao Paulo Silva Waikato Regional Council	Oppose	<p>The submitter is seeking to amend Objective 2.3.2.1. to include a new bullet point that reads: <i>'Ensures the protection of Significant Geothermal Features including geothermal vegetation.'</i></p> <p>The addition of a new bullet point (and reference to 'protection') is opposed by Contact Energy on the basis that it is inconsistent with the policy regime in the Regional Policy Statement and Waikato Regional Plan.</p>	<p>Reject the relief sought by the submitter. Refer to the original submission by Contact Energy.</p>
OS29.4	Joao Paulo Silva Waikato Regional Council	Oppose	<p>The submitter is seeking to amend Objective 2.3.2.1. to include a new bullet point that reads: <i>'Ensure that building, roading and infrastructure developments are directed away from geothermal hazards.'</i></p> <p>The amendments sought are too vague and are therefore opposed. It is not clear what is meant by 'directed away from geothermal hazards'.</p>	<p>Reject the relief sought by the submitter. Refer to the original submission by Contact Energy.</p>
OS29.8	Joao Paulo Silva Waikato Regional Council	Oppose	<p>The submitter is seeking to add a new policy to 2.3.3 as follows: <i>'Avoid new development and subdivision of areas in close proximity to Significant Geothermal Features as mapped in the Waikato Regional Plan'</i>.</p> <p>The amendments sought are too vague and are therefore opposed. It is not clear what is meant by <i>'in close proximity to Significant Geothermal Features'</i>. The use of <i>'avoid'</i> is also opposed. <i>'Development'</i> would include renewable electricity generation activities.</p>	<p>Reject the relief sought by the submitter. Refer to the original submission by Contact Energy.</p>

OS29.10	Joao Paulo Silva Waikato Regional Council	Support in part	<p>The submitter is seeking to amend Strategic Directions 2.5.2 Significant and Local Infrastructure to recognise the importance of the district's electricity generating capacity to the local and national economy.</p> <p>The amendments proposed (changing the percentage from 20% to 27% and providing wording that recognises the local and national importance of Taupō's electricity-producing capability) are supported.</p>	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.
OS29.11	Joao Paulo Silva Waikato Regional Council	Oppose in part	<p>The submitter is seeking to amend Strategic Directions 2.6.6 Natural Environment Values as follows:</p> <p>To include the following sentence:</p> <p><u>Our rare habitats include 42% of the nation's geothermal vegetation, a rare and vulnerable ecosystem type.</u></p> <p><u>And</u></p> <p><u>include a new policy in 2.6.3. to read:</u></p> <p><u>Map as SNAs all geothermal areas that meet the Waikato Regional Policy Statement definition of SNA, and ensure their protection.</u></p> <p>The proposal to recognise geothermal vegetation (as required under the NPS) is supported. However the requirement to 'and ensure their protection' is opposed by Contact Energy on the basis that it is inconsistent with the policy regime in the RPS and WRP.</p>	Reject the relief sought insofar as it is inconsistent with the original submission by Contact Energy.

Submitter No. 48 Pukawa D2 Trust				
OS58.1	Joan Forret Pukawa D2 Trust	Oppose	<p>The submitter is seeking amendments to the Strategic Directions.</p> <p><i>“To assist with the importance and status of each direction, a hierarchy should be established... to ensure Tangata Whenua – Direction 1 is regarded on all decision making processes to take into account the principles of te Tiriti of Waitangi... <u>The order of the Strategic Directions reflects the status and importance of each Direction and its objectives and policies.”</u></i></p> <p>The proposal to establish a hierarchy on the order of the Strategic Directions in Chapter 2 is opposed by Contact Energy.</p>	Reject the relief sought by the submitter.
OS58.3	Joan Forret Pukawa D2 Trust	Oppose	<p>The submitter is seeking amendments to the Strategic Directions Objective 2.1.2. The amendments involve altering the order of the objectives.</p>	Reject the relief sought by the submitter insofar as it is consistent with the relief sought in the original submission by Contact Energy.

Krystal Foden

From: District Plan
Subject: FW: Further Submissions

From: Mark Chrisp <mark.chrisp@mitchelldaysh.co.nz>
Sent: Friday, 28 April 2023 10:59 AM
To: Hilary Samuel <hsamuel@taupo.govt.nz>
Subject: RE: Further Submissions

Caution: This email originated from outside of the organisation. Do not click links, open attachments, or respond unless you recognise the sender and know the content is safe.

Hi Hillary

Yes, that sounds fine with me.

Regards

 **Mark Chrisp**
Partner

+64 27 475 8383 | PO Box 1307, Hamilton 3240
www.mitchelldaysh.co.nz

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From: Hilary Samuel <hsamuel@taupo.govt.nz>
Sent: Friday, April 28, 2023 10:00 AM
To: Mark Chrisp <mark.chrisp@mitchelldaysh.co.nz>
Subject: Further Submissions

Hi Mark

Just entering further subs. Our online system which we put all the subs into is set up to exactly match Form 6. That means we have no "in parts" allowed. Are you comfortable that we delete all the "in parts" so support in part would become support and so on? We can move the qualification i.e. "accept the relief sought by the submitter only insofar as the outcome is consistent with the Waikato Regional Plan and the original submission by Contact Energy" and put that in the reasons box.

Sound ok?

Hilary Samuel Senior Policy Advisor

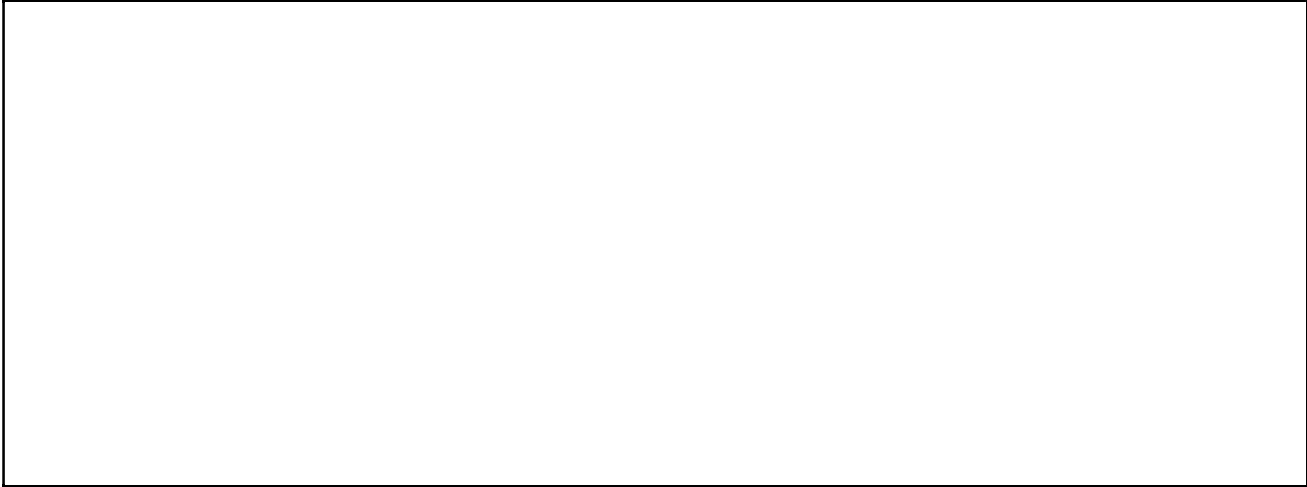
My office hours are school hours Monday, Tuesday, Thursday and Friday.

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**Organisation:**

Barker & Associates

First name: Gareth**Last name:** Moran**On behalf of:**

Taupo Industrial Estate Limited (TIEL)

Postal address: C/o Barker & Associates (Gareth Moran)**Suburb:****City:** Cambridge**Country:** New Zealand**Email:** Garethm@barker.co.nz**Daytime Phone:** 021 745979

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

If others make a similar submission, TIEL will consider presenting a joint case with them at a Hearing.

Attached Documents

File
PDF - FS TIEL
PDF - FS TIEL - Acceptance of Changes

**FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 43 TO THE TAUPO DISTRICT PLAN
PURSUANT TO CLAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991**

To:

Taupo District Council

Private Bag 2005

Taupo 3352

Via email only: districtplan@taupo.govt.nz.

Submitter:

Taupo Industrial Estate Limited (TIEL)

C/o Barker & Associates (Gareth Moran)

Suite 5, 47 Alpha Street

Cambridge 3434

Via email: Garethm@barker.co.nz

021 745 979

1.0 Submission Information

- 1.1 The specific Plan Change (“PC”) 43 submissions that Taupo Industrial Estate Limited (“TIEL”) which to further submit on are attached.
- 1.2 TIEL supports and/or opposes the specific submissions listed in the attached document. The reasons for TIEL’s position are stated in the attached document.
- 1.3 The decisions TIEL wishes Council to make ensure that the issues raised by TIEL are dealt with are contained in the attached document.
- 1.4 TIEL wishes to be heard in support of this further submission.
- 1.5 If others make a similar submission, TIEL will consider presenting a joint case with them at a Hearing.

2.0 Introduction

- 2.1 TIEL welcomes the opportunity to provide further submissions on the original submissions lodged in relation to Plan Change 43 – Taupo Industrial Land.

3.0 General Feedback

- 3.1 TIEL further submissions relate to the following submissions that are only relevant to that area defined as **‘Site 7’** within PC 43. These particular submissions are listed below and summarised in Table 1.
 - Submission #OS29.19 – Waikato Regional Council (Joao Paulo);
 - Submission #OS55.6 – Amplify (Rick Keehan)
 - Submission #OS62.2 - Alana Delich
 - Submission #OS67.1 – Advance Properties Group Limited (Warren Ladbrook)
 - Submission #OS91.22 – Federated Farmers of New Zealand (Colin Guyton);
 - Submission #OS93.77 – Contact Energy Limited (Mark Crisp);
 - Submission #OS113.37 – New Zealand Transport Agency (Luke Braithwaite); and
 - Submission OS114.17 – Taupo Climate Action Group (Alana Delich)

TIEL remains in support of PC 43 as notified.

4.0 Further Submission on Plan Change 43 – Taupo Industrial Land

Submission#	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought
Submission #OS29.19 – Waikato Regional Council (Joao Paulo)	Oppose	<p>The submitter opposes the proposed rezoning of Sites 4 and 7 for industrial development.</p> <p>The submitter recommends that Taupo District Council (TDC) promotes areas for future development that do not pose risks for Significant Natural Areas (SNAs) and for Significant Geothermal Features (SGFs) and are free from geothermal hazards as these can pose risks for human health.</p> <p>The submitter has stated that if this relief is not provided then TDC should only rezone parts of the sites that are free from geothermal hazards and provide strict controls to manage development within and adjoining Site 7. This should include planted buffers protecting the SNAs and SGFs from development and buffers to mitigate air quality issues as well as setbacks from the hot ground overlay.</p>	<p>TIEL have commissioned an independent geotechnical report prepared by HD Geo to provide a preliminary geotechnical investigation for Site 7. The scope of this assessment included an evaluation of the actual and potential geothermal activity on the site.</p> <p>The key findings of this assessment conclude that the site does not contain any Significant Geothermal Features. On this basis the planted buffers and additional setbacks requested by the submitter are not necessary.</p> <p>Furthermore, given Site 7 is held in pasture, the area does not contain land which could be categorised as 'Significant Natural Area' (SNA).</p> <p>On this basis, TIEL seeks that the PC is approved as notified.</p>

<p>Submission #OS55.6 Amplify (Rick Keehan)</p>	<p>Support</p>	<p>The submitter is in full support of the PC has notified.</p> <p>The submitter agrees that there is a demand and need for additional industrial land within the Taupo District. It is important for the economic growth and development of the region that a suitable supply of appropriate land is available and support the plan to rezone land to either Taupo or Centennial Industrial Environment</p>	<p>TIEL concur with the key points raised by the submitter and seek the PC is approved as notified.</p>
<p>Submission #OS62.2 (Alana Delich)</p>	<p>Seek amendment</p>	<p>The submitters seek the inclusion of indigenous dominant buffer and increase the resilience of a geothermal ecosystem include fencing to exclude vehicles and industrial encroachment, weed control, planting of native buffer vegetation, and animal pest control. Weed and pest control also critical.</p>	<p>The HD Geotechnical Report concludes that Site 7 does not contain any evidence of hot springs, steam vents, steaming grounds or mud pools or any area that could be categorised as Significant Geothermal Feature or Significant Natural Area.</p> <p>On this basis, the additional restrictions identified by the submitter are not necessary in how they relate to Site 7.</p> <p>Furthermore, it is inappropriate to include plan provisions that require the specific management and mitigation criteria outlined by the submitter. This level of detail (if required) is best managed through a resource consent process.</p> <p>On this basis, TIEL are in opposition to the relief sought be the submitter.</p>

<p>Submission #OS67.1 – Advance Properties Group Limited (Warren Ladbrook)</p>	<p>Oppose</p>	<p>The submitter seeks that the PC is rejected on the following basis.</p> <ul style="list-style-type: none"> • The land proposed to be zoned for industrial purposes adjoins residentially zoned land. Residential and industrial land uses are considered to be inherently incompatible. • The proposed rezoning is incompatible with the Consent Notice due to the notice limiting access onto Napier Taupo and the prescribed land use which is a campus precinct. 	<p>TIEL are in opposition to this submission, as the Taupo District Plan contemplates the interface between the Industrial Zone and Residential Zone land uses, by way of specific setbacks and landscaping requirements.</p> <p>Consent Notices on the Record of Title for the land within Site 7 are not relevant to the proposal to re-zone the land. Furthermore, consent notices may be removed by way of separate regulatory process pursuant to section 221 of the RMA.</p>
<p>Submission OS91.22 – Federated Farmers of New Zealand (Colin Guyton)</p>	<p>Support</p>	<p>The submitter supports proposed plan change 43 in its entirety, noting that the new land to be rezoned is suitably located near existing industrial zones and adjacent to key transportation networks.</p>	<p>TIEL concur with the key points raised by the submitter and seek the PC is approved as notified.</p>
<p>Submission OS93.77 – Contact Energy Limited (Mark Crisp)</p>	<p>Support</p>	<p>The submitter is in full support with the PC as notified.</p>	<p>TIEL concur with the key points raised by the submitter and seek the PC is approved as notified.</p>

<p>Submission OS113.37 – New Zealand Transport Agency (Luke Braithwaite)</p>	<p>Seeks amendment</p>	<p>The submitter appreciates that that the Taupo Future Industrial Land Option Economic Multi-Criteria Analysis 2022 indicates that there is a shortfall in industrial land supply. However, considers that not enough investigation has been undertaken against key documents to show the suitability of this rezoning.</p>	<p>The reference to “key documents” by the submitter is vague and needs further explanation.</p> <p>However, as outlined within TIEL’s initial submission in support of the PC, from a transportation perspective, the proposed rezoning of Site 7 provides opportunities to maximise the investment value in the existing and planned transport networks.</p> <p>The PC will enable the relocation of industrial and ‘big box’ car-based retail outlets to locate adjacent to the arterial road network (State Highway 1 and 5), potentially removing these activities and their associated high car use and commercial vehicle needs from the town centre.</p> <p>Site 7 has potential to connect to the existing walking and cycling network along the Eastern Taupo Arterial and is well located in relation to other similar activities, existing and planned residential areas to provide employment opportunities as well as some everyday supporting services which reduces people’s overall need to travel</p> <p>TIEL is in opposition to this submission insofar as it relates to Site 7.</p>
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<p>Submission OS114.17 – Taupo Climate Action Group (Alana Delich)</p>	<p>Oppose</p>	<p>The submitter considers the inclusion of the site at 189 Napier Road from Rural to Industrial as inconsistent with 2.4 Strategic Direction Climate Change when there is already a large industrial area opposite this site.</p> <p>The submitter seeks that the industrial zone at 189 Napier Road (Site 7) is removed from the plan change.</p>	<p>TIEL is in opposition to this submission as TDC has confirmed in the S32 report that the existing land zoned industrial isn't sufficient to supply availability in 30 years plus (long term).</p> <p>The PC responds to the lack of sufficient industrial land supply and forecast growth of Taupo.</p> <p>Furthermore, the basis for the submitter's position regarding "Climate Change" is unclear and lacks explanation.</p>
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Nikki Donaldson

From: Hilary Samuel
Sent: Tuesday, 18 April 2023 11:08 AM
To: District Plan
Subject: FW: Further information required - Further submission

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Nikki, Submission

Hilary Samuel Senior Policy Advisor

My office hours are school hours Monday, Tuesday, Thursday and Friday.

Taupō District Council • 30 Tongariro Street, Taupō 3330
Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

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From: Gareth Moran <GarethM@barker.co.nz>
Sent: Tuesday, 18 April 2023 11:00 AM
To: Hilary Samuel <hsamuel@taupo.govt.nz>
Subject: RE: Further information required - Further submission

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Thank you

Looks good – and we are accepting of your changes

Ngā mihi | Kind regards,

GARETH MORAN
Senior Associate
021 745 979
GarethM@barker.co.nz

barker.co.nz



This email and any attachments are confidential. They may contain privileged information or copyright material. If you are not an intended recipient, please do not read, copy, use or disclose the contents without authorisation and we request you delete it and contact us at once by return email.

From: Hilary Samuel <hsamuel@taupo.govt.nz>
Sent: Tuesday, 18 April 2023 10:41 am
To: Gareth Moran <GarethM@barker.co.nz>
Cc: District Plan <districtplan@taupo.govt.nz>
Subject: RE: Further information required - Further submission

Hi Gareth

You will be B in the option below – representing an interest greater than the public generally. Because you are representing a client who is having land proposed to be rezoned – so they are effected more than the public generally.

In terms of the answers – you can only support or oppose (not seek amendment) and then you need to seek to allow or disallow the point. So generally for you points in opposition you are seeking that the Commissioners disallow the original submission point and visa versa.

I have amended your further submission with my interpretation marked – can you please confirm Gareth.

Hilary Samuel Senior Policy Advisor

My office hours are school hours Monday, Tuesday, Thursday and Friday.

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Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

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From: District Plan <districtplan@taupo.govt.nz>
Sent: Monday, 17 April 2023 4:42 PM
To: Hilary Samuel <hsamuel@taupo.govt.nz>
Subject: FW: Further information required - Further submission

Hi Hilary,

Are you able to explain further to Gareth. I have attached the further submission for reference. Within the sub it only states if they support/seek amendment etc not if they allow or disallow as well. And the declaration has not been completed.

Ngā mihi

Nikki Donaldson Senior Customer & Business Support Officer

Taupō District Council • 30 Tongariro Street Taupō 3330
Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

T +64 7 376 0899 **E** businesssupport@taupo.govt.nz

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From: Gareth Moran <GarethM@barker.co.nz>
Sent: Monday, 17 April 2023 2:35 PM
To: District Plan <districtplan@taupo.govt.nz>

Cc: mark@paragon.net.nz

Subject: RE: Further information required - Further submission

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Hi Nikki

The table within our submission; identifies whether we are in support or opposition to the submissions.

In terms of the declaration; I'm the Planner (agent) representing Taupo Industrial Estate.....it's a little unclear what box that fits into. Are you able to provide further guidance.

Thank you

Ngā mihi | Kind regards,

GARETH MORAN
Senior Associate
021 745 979
GarethM@barker.co.nz



barker.co.nz 

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From: District Plan <districtplan@taupo.govt.nz>

Sent: Monday, 17 April 2023 2:10 pm

To: Gareth Moran <GarethM@barker.co.nz>

Cc: mark@paragon.net.nz

Subject: Further information required - Further submission

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Kia ora Gareth,

Can you please complete the person of interest declaration for the attached submission. We also require you to advise if you seek that council allow/disallow each submission point.

Person of interest declaration: I am

- (a) a person representing a relevant aspect of the public interest, or
- (b) a person who has an interest in the proposal that is greater than the interest the general public has, or
- (c) the local authority for the relevant area

Explain the grounds for saying you come within category (a) or (b) above:

Many thanks

Ngā mihi

Nikki Donaldson Senior Customer & Business Support Officer

Taupō District Council • 30 Tongariro Street Taupō 3330
Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

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From: Gareth Moran <GarethM@barker.co.nz>

Sent: Thursday, 6 April 2023 10:30 AM

To: District Plan <districtplan@taupo.govt.nz>

Cc: Mark Wright <mark@paragon.net.nz>

Subject: Further submission

Caution: This email originated from outside of the organisation. Do not click links, open attachments, or respond unless you recognise the sender and know the content is safe.

Good morning

Please find attached the further submission on behalf of Taupo Industrial Estate Limited.

If you could please confirm you have received this email.

Thank you, and enjoy your day.

Ngā mihi | Kind regards,

GARETH MORAN

Senior Associate

021 745 979

GarethM@barker.co.nz

PO Box 9342,

Waikato Mail Centre, Hamilton 3240

Level 1

47 Alpha St

Cambridge 3434

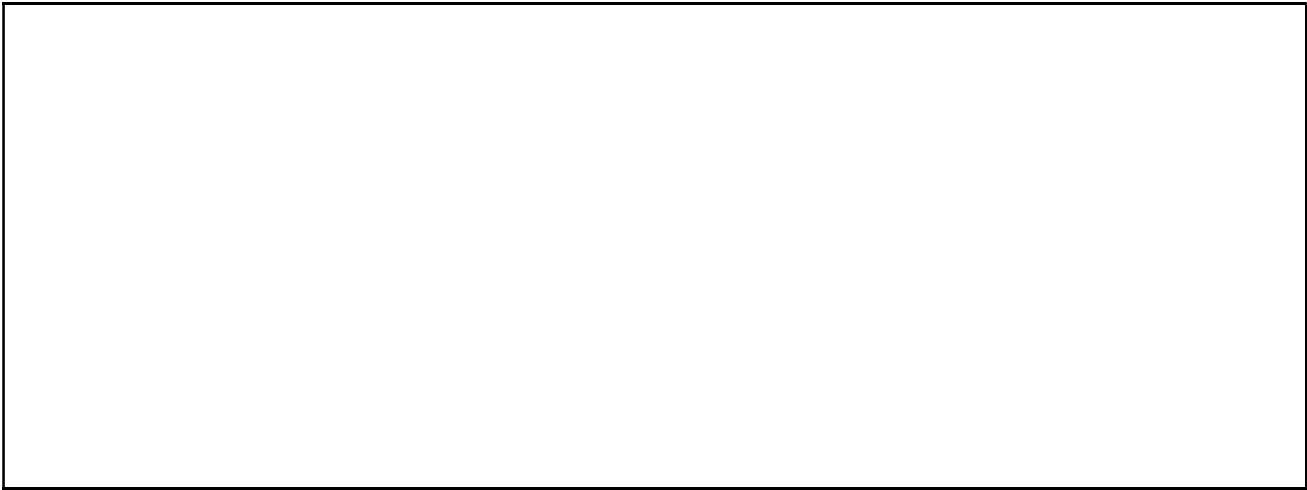


Kerikeri, Whangārei, Warkworth,
Auckland, Hamilton, **Cambridge**,
Tauranga, Napier, Wellington,
Christchurch, Queenstown, Wānaka

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Organisation:

EnviroNZ

First name: Kaaren**Last name:** Rosser**Postal address:** Private Bag 92801**Suburb:** Penrose**City:** Auckland**Country:** New Zealand**Postcode:** 1642**Email:** kaaren.rosser@environz.co.nz**Daytime Phone:** 027 554 1065 I could I could not

Gain an advantage in trade competition through this submission

 I am I am not

directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

If others make a similar submission, I will consider presenting a joint case with them at a hearing:

Attached Documents

File
Further Submission Envirowaste 2



Taupō District Plan

Proposed Plan Changes 38-43

Further Submission Form RMA Form 6

Office use box

This form will be copied. Please do not print outside the frame.

Please remember that Further Submissions must reach Taupō District Council by 4.30pm on Friday 7 April 2023.

Submitter Details:

Full Name: EnviroNZ

Contact person: (if applying on behalf of an organisation)

Address for correspondence: Enviro (NZ) Limited | Private Bag 92810, Penrose | Auckland 1642

Phone Number: 0275541065 Email Address: kaaren.rosser@environz.co.nz

Further Submitter Relevance: I am: (select one)

- (a) A person representing a relevant aspect of the public interest; or
(b) A person who has an interest in the proposal that is greater than the interest the general public has.

Explain the grounds for saying that you come within category (a) or (b) above:

As the operator of Council waste and recycling infrastructure in the Taupo area, EnviroNZ has an interest greater than the general public.

Public Hearing:

I/we wish to be heard in support of my/our submission: Yes [X] No []

If others make a similar submission, I will consider presenting a joint case with them at a hearing: Yes [X] No []

Signed: Date: 6.04.23

(A signature is not required if you make your submission by electronic means.)

Please return completed forms no later than 4.30pm on Friday 7 April 2023 to:

- Further Submissions on Plan Changes 38-43
Taupō District Council
30 Tongariro Street
Private Bag 2005
Taupō 3352 or
e-mail districtplan@taupo.govt.nz

PLEASE FILL IN YOUR FURTHER SUBMISSION OVERLEAF

Privacy note: When a person or group makes a submission or further submission on Taupō District Plan Change 38-43 this is public information. Please note that by making a submission your personal details, including your name and addresses will be made publicly available under the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to TDC. There are limited circumstances when your submission or your contact details can be kept confidential. If you consider you have reasons why your submission or your contact details should be kept confidential please contact us at districtplan@taupo.govt.nz. Please visit our Privacy Policy page for further information.

Submission Table

- We recommend using this submission table to state your submission points. This will assist Council to accurately record your submission points and ensure your submission is valid.
- Each individual submission point should be on a different row. Use as many rows as you require.
- You can attach additional commentary and documents should you need to.
- The examples in italics below are for guidance only to show how submission points could be set out and do not represent a position of Council.
- This form is for use for the following Plan Changes:
 - Plan Change 38 – Strategic Directions
 - Plan Change 39 – Residential Building Coverage
 - Plan Change 40 – Taupō Town Centre Environment
 - Plan Change 41- Removal of Fault lines
 - Plan Change 42 – General Rural and Rural Lifestyle Environments
 - Plan Change 43 – Taupō Industrial Environment Rezoning

Plan Change Number (see above)	Submitter Name / Submission Number / (refer to the submission summary report and contact list)	Submission point number	Support? Oppose? Do you support or oppose the original submission point/submission?	Reasons The reasons for my support/opposition are:	Allow? Disallow? Do you seek that council allow/disallow the submission point?	Do you wish all or part of the point to be allowed or disallowed? Please specify if part of the point.
PC42	Anna Pol	OS10.1	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Those sites within 1.5km of the regional landfill on Broadlands Road (including some sites in Centennial Drive) should not be intensified to reduce reverse sensitivity effects to the landfill.	Disallow	The entire submission point
PC42	Anna Pol	OS10.3	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Those sites within 1.5km of the regional landfill on Broadlands Road (including some sites in Centennial Drive) should not be intensified to reduce reverse sensitivity effects to the landfill.	Disallow	The entire submission point
PC43	Helen Brosnan for Mega Food Services Ltd	OS21.1	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	63 Broadlands Road is sufficiently close to the landfill to be potentially exposed to adverse effects from the operation of the landfill.	Disallow	The entire submission point

PC43	Helen Brosnan for Mega Food Services Ltd	OS21.3	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	63 Broadlands Road is sufficiently close to the landfill to be potentially exposed to adverse effects from the operation of the landfill.	Disallow	The entire submission point
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.3	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Such a definition would be beneficial to strengthen management of reverse sensitivity issues in the Plan.	Allow	The whole submission point
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.4	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Support renaming of zone for consistency. Additional description sentence supported.	Allow	The whole submission point
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.7	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The proposed additional sentence should not be supported unless amended to include regional infrastructure if regional infrastructure includes the regional landfill.	Disallow	That part of the submission point that only refers to primary production activities. Addressing the potential impacts of sensitive activities is supported
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.8	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The proposed addition restricts the effect of the objective to only primary production activities, whereas there are other activities in the zone which also are also sensitive to reverse sensitivity, such as a landfill. The wording should remain as notified.	Disallow	The whole submission point
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.9	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The proposed addition should also apply to other activities with the same effects that are lawfully established.	Disallow	That part of the submission point as applying only to primary production activities. Landfills, for example, are also subject to sights, odour and dust.

PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.11	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The use of setbacks is optimal but should be applied to other activities that are affected from reverse sensitivity effects as well.	Disallow	That part of the submission point as only applying to primary production activities.
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.12	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Activities within the zone should be specified or discretionary.	Disallow	The whole submission point.
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.14	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The rule should be more nuanced to recognise those industrial and commercial activities that are essentially home occupations to be permitted, with any other industrial or commercial activities being discretionary.	Disallow	That part of the submission point that amends activity status for home occupations to be discretionary in the first instance.
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.23	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Amendments are required to the proposed reserve sensitivity clauses to allow for regional infrastructure activities that are subject to reverse sensitivity.	Disallow	That part of the submission point only referring to constraining primary production activities under the reverse sensitivity wording.
PC42	Sarah Cameron of Horticulture NZ	OS26.3	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	NZ Planning Standards should be used where possible.	Allow	The whole submission point
PC42	Sarah Cameron of Horticulture NZ	OS26.14	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Support definition for Primary Production which aligns with Planning Standards.	Allow	The whole submission point
PC42	Sarah Cameron of Horticulture NZ	OS26.15	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The proposed definition does not allow for activities that are not horticulture to be defined as subject to reverse sensitivity. Needs to	Disallow	The wording referring to Horticulture New Zealand. The rest of the text should be allowed.

				encompass all situations and should be amended.		
PC42	Sarah Cameron of Horticulture NZ	OS26.20	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Support new objective as it encompasses activities that have a functional need to be located in the rural environment.	Allow	The whole submission point
PC42	Sarah Cameron of Horticulture NZ	OS26.23	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The proposed additional text does not accommodate other activities in the Rural zone that are subject to reverse sensitivity effects. Further amendments are required.	Disallow	The proposed amendment to 3b.2.4
PC42	Sarah Cameron of Horticulture NZ	OS26.27	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The new policy is supported.	Allow	The whole submission point
PC42	Sarah Cameron of Horticulture NZ	OS26.29	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Landfills in the rural environment are also subject to reverse sensitivity.	Disallow	The whole submission point
PC42	Sarah Cameron of Horticulture NZ	OS26.30	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The policy should be further amended to strengthen it and avoid uses that do not need to be in the rural environment	Allow	The whole submission point as relating to amendment to policy 3b.2.14.
PC42	Sarah Cameron of Horticulture NZ	OS26.55	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Subdivision being restricted discretionary is supported. The submitter does not consider that full notification is always warranted.	Allow	That part of the submission that makes a subdivision restricted discretionary up to Matters of Discretion. Not all matters of discretion proposed are supported, nor mandatory notification.
PC42	Sarah Cameron of Horticulture NZ	OS26.56	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that controlled activity subdivision will not achieve outcome to protect effects on highly productive land.	Allow	The whole submission point.
PC43	Joao Paulo of Waikato	OS29.19	<input checked="" type="checkbox"/> Support	Agree regarding the opposing of rezoning. However, if site 4 is rezoned, then only industrial	Allow	The whole submission point.

	Regional Council		<input type="checkbox"/> Oppose	uses should be permitted in the zone that are compatible with potential odour effects from the regional landfill.		
PC43	Joao Paulo of Waikato Regional Council	OS29.20	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Submitter prefers that Site 4 is not rezoned and that subdivision is discretionary within 1.5km buffer of landfill.	Disallow	The whole submission point.
PC38	Joao Paulo of Waikato Regional Council	OS29.27	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that plan changes should be in National Planning Standards format.	Allow	The whole submission point
PC42	Patrick Edwards of Miraka Ltd	OS35.9	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Agree that proposed policy 3b.2.13 does not encompass reverse sensitivity effects generated by existing adjoining land uses on new uses, however proposed new wording needs to be stronger than 'manage'. See Policy B9.2.2 of AUP.	Disallow	That part of the submission point referring to managing subdivision.
PC42	Patrick Edwards of Miraka Ltd	OS35.10	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Support activity status being more than permitted.	Allow	The whole submission point.
PC42	Kirsteen McDonald of Sikka & Aggarwal Investment Ltd	OS43.5	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The land in question should be rezoned rather than objectives and rules amended under the General Rural zone to enable tourism activities further.	Disallow	The whole submission point
PC42	Burke Carlton of CH GP Ltd Trust	OS53.7	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The submitter opposes subdivision where it results in increased lots within 1.5 ha of the regional landfill or other waste infrastructure.	Disallow	The whole submission point
PC42	Helen Brosnan of Permapine Limited	OS56.14	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Proposed additions are not supported unless considered alongside other proposed amendments by EnviroNZ.	Disallow	The whole submission point

PC42	Helen Brosnan of Permapine Limited	OS56.19	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The amendment is not necessary.	Disallow	The whole submission point
PC38	James Ryan	OS57.1	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Support described amendments to Policy 2.3.3	Allow	The whole submission point
PC42	James Ryan	OS57.9	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Reasoning for proposed amendment is acceptable however proposed wording does not allow for those infrastructure activities that have a functional need to be there.	Allow	The whole submission point with additional wording
PC42	James Ryan	OS57.12	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	While it is considered that the objective needs to be reworded for other reasons, any final version of this objective should include consented activities.	Allow	The whole submission point.
PC42	James Ryan	OS57.13	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed wording better reflects the continued functioning of infrastructure. However, if regional waste facilities are not defined as infrastructure then waste facilities should be considered similarly.	Allow	The whole submission point
PC42	James Ryan	OS57.14	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendments to Policy 3b.2.9 are generally acceptable however other infrastructure (provided regional waste facilities are defined as infrastructure) needs to be included	Allow	The whole submission point however further amendments are required.

PC42	James Ryan	OS57.15	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendments to Policy 3b.2.10 wording will allow the reverse sensitivity effects of residential units to rural uses being acknowledged. However additional wording is necessary to be stronger than limiting residential units.	Allow	The whole submission point, however further amendments are required.
PC42	James Ryan	OS57.16	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that minor residential units are also sensitive activities that should be sited to avoid reverse sensitivity effects.	Allow	The whole submission point.
PC42	James Ryan	OS57.19	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Any final version of this objective should include consented activities.	Allow	That part of the point referring to consented activities.
PC42	James Ryan	OS57.20	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that the objective should be broader that community infrastructure and include all infrastructure which would include a landfill.	Allow	The whole submission point.
PC42	James Ryan	OS57.23	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that minor residential units are also sensitive activities that should be sited to avoid reverse sensitivity effects.	Allow	The whole submission point.
PC42	James Ryan	OS57.25	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	EnviroNZ supports the addition of the wording that allows avoidance of reverse sensitivity matters to be a matter of discretion.	Allow	That part of the submission point referring to amendments under (f).
PC42	James Ryan	OS57.41	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed wording is supported.	Allow	The whole submission point.

PC42	James Ryan	OS57.43	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The reverse sensitivity effects of some home businesses need to be acknowledged.	Allow	The whole submission point.
PC38	Hayley Stronge of Mercury	OS68.3	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The further objective will also benefit separating urban activities from the regional landfill.	Allow	The whole submission point.
PC38	Hayley Stronge of Mercury	OS68.4	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Subdivision effects need to be considered further than the adjoining property. Agree that reverse sensitivity effects do not arise from “existing uses”	Allow	The whole submission point.
PC38	Hayley Stronge of Mercury	OS68.9	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendment to strengthen 2.5.1(1) is supported.	Allow	That part of the submission point referring to 2.5.1(1).
PC42	Hayley Stronge of Mercury	OS68.18	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Locating maori cultural activities, tourism activities, <u>and</u> visitor accommodation in appropriate locations is vital to reduce reverse sensitivity effects however this objective can be further strengthened to ensure avoidance of reverse sensitivity occurs to regional infrastructure.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.19	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Any final version of this objective should include consented activities.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.20	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendments are supported provided regional waste facilities are defined as infrastructure.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.21	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that wording to not compromise the character of the General Rural Environment is preferable to maintaining the	Allow	That part of the submission point referring to not compromising the character of the zone, along with additional zone defining clauses.

				established character so that new activities can take place in accordance with the described character. Additional clauses are needed to include quarries and landfills.		
PC42	Hayley Stronge of Mercury	OS68.22	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendments to Policy 3b.2.10 wording will allow the reverse sensitivity effects of residential units to rural uses to be acknowledged. However additional wording is necessary to be stronger than limiting residential units.	Allow	That part of the submission point up to, but not including (e).
PC42	Hayley Stronge of Mercury	OS68.23	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that minor residential units are also sensitive activities that should be sited to avoid reverse sensitivity effects.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.24	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed wording is supported.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.27	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that direction for zoning Rural Lifestyle areas is necessary in terms of reverse sensitivity issues however this may be best located in the strategic chapter.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.28	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Any final version of this objective should include consented activities.	Allow	That part of the submission point referring to consented activities.
PC42	Hayley Stronge of Mercury	OS68.31	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendments are supported provided regional waste facilities are defined as infrastructure.	Allow	The whole submission point.

PC42	Hayley Stronge of Mercury	OS68.34	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that minor residential units are also sensitive activities that should be sited to avoid reverse sensitivity effects.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.36	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	EnviroNZ supports the addition of the wording that allows avoidance of reverse sensitivity matters to be a matter of discretion	Allow	That part of the submission point referring to amendments under (f).
PC42	Hayley Stronge of Mercury	OS68.39	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	EnviroNZ supports the addition of the wording that allows avoidance of reverse sensitivity matters to be a matter of discretion	Allow	The whole submission point.
PC38	Duncan Whyte of Tauhara Quarries Ltd	OS75.3	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The additional wording will allow for waste facilities to be included if not defined as infrastructure.	Allow	The whole submission point.
PC42	Duncan Whyte of Tauhara Quarries Ltd	OS75.4	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	NPS definition for primary production is supported.	Allow	The whole submission point.
PC42	Catriona Eagles of Cheal Consultants	OS79.11	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	NPS definition should be used.	Disallow	The whole submission point.
PC42	Catriona Eagles of Cheal Consultants	OS79.26	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Reverse sensitivity effects need to be acknowledged.	Allow	The whole submission point.
PC42	Catriona Eagles of Cheal Consultants	OS79.33	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Reverse sensitivity effects need to be considered as a matter of discretion.	Allow	That part of the submission point referring to <u>“The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated”</u> .

PC42	Catriona Eagles of Cheal Consultants	OS79.34	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Reverse sensitivity effects also need to be considered.	Allow	That part of the submission that includes the deletion of the additional assessment criteria.
PC42	Catriona Eagles of Cheal Consultants	OS79.54	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	This would amend inconsistencies.	Allow	The whole submission point.
PC42	Catriona Eagles of Cheal Consultants	OS79.58	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Reverse sensitivity matters should also be considered.	Allow	The whole submission point.
PC38	Alice Lin of Genesis Energy	OS84.2	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The amendments are supported.	Allow	The whole submission point.
PC43	Ashley Sycamore of Dept of Conservation	OS89.21	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	EnviroNZ supports the retention of the existing zoning but for reverse sensitivity reasons in relation to Taupo landfill.	Allow	The whole submission point.
PC38	Colin Guyton of Federated Farmers	OS91.6	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Reverse sensitivity effects need to be recognised from and to different land uses. The proposed wording should be amended to reflect both sides of the issue.	Disallow	That part of the submission pont <u>“infrastructure may have on existing land use activities and to avoid, remedy or mitigate these effects where possible.”</u>
PC38	Mark Crisp of Contact Energy Ltd	OS93.8	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The further objective will also benefit separating urban activities from the regional landfill.	Allow	The whole submission point.
PC42	Mark Crisp of Contact Energy Ltd	OS93.76	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that this area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities	Allow	The whole submission point.
PC43	Mark Crisp of Contact Energy Ltd	OS93.82	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	This outcome would reduce reverse sensitivity effects to the Taupo landfill.	Allow	The whole submission point.

PC42	Mark Crisp of Popeye Development Limited, Taupo Motorsport Park (NZ) Limited trading as Taupo International Motorsport Park and Events Centre (collectively the "Companies")	OS97.1	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that the separation of incompatible land use activities is in accordance with sound planning and resource management practice. Intensification of these sites will potentially lead to increased reverse sensitivity effects.	Allow	The whole submission point.
PC42	Mark Westbrook	SS100.1	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The location is not suitable for intensification.	Disallow	The whole submission point
PC42	Trudi Burney of Transpower NZ Ltd	OS110.12	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	'Sensitive activities' is a concept that can be applied to many uses subject to reverse sensitivity. Therefore, the reference to (in the National Grid Yard) should be deleted	Disallow	That part of the submission point referring to "in the National Grid Yard".
PC38	Annabelle Lee of Radio NZ Ltd	OS112.1	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Any definition for regional infrastructure would need to include regional landfills.	Allow	The whole submission point